

Aug. 6. 2020 3:00PM

CASE 20-C-29

Wetzel

No. 1362 P. 2

PAGE 0001

JEFFREY BLANIAR

VS. SOUTHWESTERN ENERGY COMPANY

LINE DATE ACTION

1 07/07/20 CCIS & COMPLAINT IN CIVIL ACTION W/ EXHIBIT (A) FILED.
 2 07/07/20 SUMMONS ISSUED (SOUTHWESTERN ENERGY COMPANY, SWN WELL SERVICES
 3 LLC, SWN DRILLING COMPANY LLC, SWN ENERGY SERVICES COMPANY LLC,
 4 SWN PRODUCTION COMPANY LLC, SWN WATER RESOURCES COMPANY LLC,
 5 SWN E&P SERVICES LLC, SWN MIDSTREAM SERVICES CO LLC, THE
 6 GORMAN-RUPP COMPANY, JGB ENTERPRISES INC, CAMPBELL FITTINGS INC,
 7 *COPY OF SUMMONS & COMPLAINT IN CIVIL ACTION W/EXHIBIT(A)
 8 MAILED TO S.O.S FOR SERVICE.
 9 07/08/20 SUMMONS ISSUED (DANIEL DURIG & RHONDA DURIG)
 10 *COPY OF SUMMONS & COMPLAINT IN CIVIL ACTION W/EXHIBIT (A)
 11 GIVEN TO SWCO FOR SERVICE.
 12 07/09/20 PROCESS RETURNED EXECUTED "PERSONAL" FOR DANIEL DURIG
 13 07/09/20 PROCESS RETURNED EXECUTED "C/O DANIEL DURIG" FOR RHONDA DURIG,
 14 07/17/20 PROCESS "ACCEPTED FOR SERVICE OF PROCESS" BY S.O.S ON 07/13/20
 15 FOR SWN WELL SERVICES LLC.
 16 07/17/20 PROCESS "ACCEPTED FOR SERVICE OF PROCESS" BY S.O.S ON 07/13/20
 17 FOR SWN DRILLING COMPANY LLC.
 18 07/17/20 PROCESS "ACCEPTED FOR SERVICE OF PROCESS" BY S.O.S ON 07/13/20
 19 FOR SWN PRODUCTION COMPANY LLC.
 20 07/17/20 PROCESS "ACCEPTED FOR SERVICE OF PROCESS" BY S.O.S ON 07/13/20
 21 FOR SWN ENERGY SERVICES.
 22 07/17/20 PROCESS "ACCEPTED FOR SERVICE OF PROCESS" BY S.O.S ON 07/13/20
 23 FOR SWN MIDSTREAM SERVICES CO. LLC.
 24 07/17/20 PROCESS "ACCEPTED FOR SERVICE OF PROCESS" BY S.O.S ON 07/13/20
 25 FOR SWN WATER RESOURCES COMPANY LLC,
 26 07/17/20 PROCESS "ACCEPTED FOR SERVICE OF PROCESS" BY S.O.S ON 07/13/20
 27 FOR THE GORMAN RUPP COMPANY.
 28 07/17/20 PROCESS "ACCEPTED FOR SERVICE OF PROCESS" BY S.O.S ON 07/13/20
 29 FOR SWN E & P SERVICES LLC.
 30 07/17/20 PROCESS "ACCEPTED FOR SERVICE OF PROCESS" BY S.O.S ON 07/13/20
 31 FOR JGB ENTERPRISES INC.
 32 07/17/20 PROCESS "ACCEPTED FOR SERVICE OF PROCESS" BY S.O.S ON 07/13/20
 33 FOR SOUTHWESTERN ENERGY COMPANY.
 34 07/17/20 PROCESS "ACCEPTED FOR SERVICE OF PROCESS" BY S.O.S ON 07/13/20
 35 FOR CAMPBELL FITTINGS INC.

I HEREBY CERTIFY THAT THE ANNEXED INSTRUMENT IS A
 TRUE AND CORRECT COPY OF THE ORIGINAL ON FILE IN
 MY OFFICE
 ATTEST: *[Signature]*
 CIRCUIT CLERK
 WETZEL CO. WEST VIRGINIA
 DEPUTY CLERK
 BY: _____



IN THE CIRCUIT COURT OF WETZEL COUNTY, WEST VIRGINIA

**CIVIL CASE INFORMATION STATEMENT
(Civil Cases Other than Domestic Relations)****I. CASE STYLE:****Plaintiff(s)**

JEFFREY BLANIAR

754 Miners Way

Shinnston, West Virginia 26431

vs.

Defendant(s)

SOUTHWESTERN ENERGY COMPANY

Name

10000 Energy Drive

Street Address

Spring, Texas 77389

City, State, Zip Code

Case No.

20-C-29

Judge:

Cramer

Plaintiff's Phone: (304) 838-8392

Days to

Answer

Type of Service

20

Secretary of State

Defendant's Phone:

II. TYPE OF CASE:

- General Civil
 Mass Litigation [As defined in T.C.R. 26.04(a)]
 Asbestos
 FELA Asbestos
 Other: _____
 Habeas Corpus/Other Extraordinary Writ
 Other: _____

- Adoption
 Administrative Agency Appeal
 Civil Appeal from Magistrate Court
 Miscellaneous Civil Petition
 Mental Hygiene
 Guardianship
 Medical Malpractice

III. JURY DEMAND: Yes No CASE WILL BE READY FOR TRIAL BY (Month/Year): 07 / 2022

**IV. DO YOU OR ANY
OF YOUR CLIENTS
OR WITNESSES
IN THIS CASE
REQUIRE SPECIAL
ACCOMMODATIONS?**

 Yes No**IF YES, PLEASE SPECIFY:**

- Wheelchair accessible hearing room and other facilities
 Reader or other auxiliary aid for the visually impaired
 Interpreter or other auxiliary aid for the deaf and hard of hearing
 Spokesperson or other auxiliary aid for the speech impaired
 Foreign language interpreter-specify language: _____
 Other: _____

Attorney Name: Peter D. Friday, Esquire

Representing:

Firm: Friday & Cox, LLC

 Plaintiff Defendant

Address: 1405 McFarland Road, Pittsburgh, PA 15216

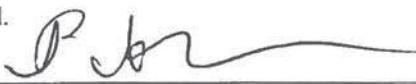
 Cross-Defendant Cross-Complainant

Telephone: (412) 561-4290

 3rd-Party Plaintiff 3rd-Party Defendant Proceeding Without an Attorney

Original and 13 copies of complaint enclosed/attached.

Dated: 07 / 06 / 2020

Signature: 

Plaintiff: JEFFREY BLANIAK, et al Case Number: 20-C-29
 vs.
 Defendant: SOUTHWESTERN ENERGY COMPANY, et al

**CIVIL CASE INFORMATION STATEMENT
DEFENDANT(S) CONTINUATION PAGE**

SWN WELL SERVICES, LLC

Defendant's Name

10000 Energy Drive

Street Address

Spring, Texas 77389

City, State, Zip Code

Defendant's Phone:

Days to Answer: 20

Type of Service: Secretary of State

SWN DRILLING COMPANY, LLC

Defendant's Name

10000 Energy Drive

Street Address

Spring, Texas 77389

City, State, Zip Code

Defendant's Phone:

Days to Answer: 20

Type of Service: Secretary of State

SWN ENERGY SERVICES COMPANY, LLC

Defendant's Name

10000 Energy Drive

Street Address

Spring, Texas 77389

City, State, Zip Code

Defendant's Phone:

Days to Answer: 20

Type of Service: Secretary of State

SWN PRODUCTION COMPANY, LLC

Defendant's Name

10000 Energy Drive

Street Address

Spring, Texas 77389

City, State, Zip Code

Defendant's Phone:

Days to Answer: 20

Type of Service: Secretary of State

SWN WATER RESOURCES COMPANY, LLC

Defendant's Name

10000 Energy Drive

Street Address

Spring, Texas 77389

City, State, Zip Code

Defendant's Phone:

Days to Answer: 20

Type of Service: Secretary of State

SWN E & P SERVICES, LLC

Defendant's Name

10000 Energy Drive

Street Address

Spring, Texas 77389

City, State, Zip Code

Defendant's Phone:

Days to Answer: 20

Type of Service: Secretary of State

SWN MIDSTREAM SERVICES CO., LLC

Defendant's Name

10000 Energy Drive

Street Address

Spring, Texas 77389

City, State, Zip Code

Defendant's Phone:

Days to Answer: 20

Type of Service: Secretary of State

Plaintiff: JEFFREY BLANIAK, et alCase Number: 20-C-29

vs.

Defendant: SOUTHWESTERN ENERGY COMPANY , et al

**CIVIL CASE INFORMATION STATEMENT
DEFENDANT(S) CONTINUATION PAGE**

THE GORMAN-RUPP COMPANY

Defendant's Name

600 South Airport Road

Street Address

Mansfield, Ohio 44903

City, State, Zip Code

Defendant's Phone:

Days to Answer: 20

Type of Service: Secretary of State

JGB ENTERPRISES, INC.

Defendant's Name

115 Metropoloitan Drive

Street Address

Liverpool, New York 13088

City, State, Zip Code

Defendant's Phone:

Days to Answer: 20

Type of Service: Secretary of State

CAMPBELL FITTINGS, INC.

Defendant's Name

301 South Washington Street

Street Address

Boyertown, Pennsylvania 19512

City, State, Zip Code

Defendant's Phone:

Days to Answer: 20

Type of Service: Secretary of State

DANIEL DURIG

Defendant's Name

2960 Macedonia Ridge Road

Street Address

New Martinsville, West Virginia 26155

City, State, Zip Code

Defendant's Phone:

Days to Answer: 20

Type of Service: Secretary of State

RHONDA DURIG

Defendant's Name

2960 Macedonia Ridge Road

Street Address

New Martinsville, West Virginia 26155

City, State, Zip Code

Defendant's Phone:

Days to Answer: 20

Type of Service: Secretary of State

Defendant's Name

Street Address

City, State, Zip Code

Defendant's Phone:

Days to Answer:

Type of Service:

Defendant's Name

Street Address

City, State, Zip Code

Defendant's Phone:

Days to Answer:

Type of Service:

IN THE CIRCUIT COURT OF WETZEL COUNTY, WEST VIRGINIA

JEFFREY BLANIAR,

CIVIL DIVISION

20-C-29

Plaintiff,

Docket No.:

vs.

SOUTHWESTERN ENERGY COMPANY;
SWN WELL SERVICES, LLC; SWN
DRILLING COMPANY, LLC; SWN
ENERGY SERVICES COMPANY, LLC,
d/b/a SWN MARKETING COMPANY; SWN
PRODUCTION COMPANY, LLC; SWN
WATER RESOURCES COMPANY, LLC;
SWN E & P SERVICES, LLC; SWN
MIDSTREAM SERVICES COMPANY,
LLC; THE GORMAN-RUPP COMPANY;
JGB ENTERPRISES, INC.; CAMPBELL
FITTINGS, INC.; DANIEL DURIG; AND
RHONDA DURIG,

Defendants.

COMPLAINT IN CIVIL ACTION

Plaintiff Jeffrey Blaniar, by and through his attorneys, Peter D. Friday, Esquire, Kevin S. Burger, Esquire and Friday & Cox LLC, complains and alleges as follows:

1. Plaintiff is an individual residing at 754 Miners Way, Shinnston, Harrison County, West Virginia 26431.
2. Defendant Southwestern Energy Company is a Delaware corporation with a principal place of business located at 10000 Energy Drive, Spring, Texas 77389.
3. Defendant SWN Well Services, LLC is a Texas limited liability company with a principal place of business located at 10000 Energy Drive, Spring, Texas 77389.
4. Defendant SWN Drilling Company, LLC is a Texas limited liability company with a principal place of business located at 10000 Energy Drive, Spring, Texas 77389.



5. Defendant SWN Energy Services Company, LLC, d/b/a SWN Marketing Company, is a Texas limited liability company with a principal place of business located at 10000 Energy Drive, Spring, Texas 77389.

6. Defendant SWN Production Company, LLC is a Texas limited liability company with a principal place of business located at 10000 Energy Drive, Spring, Texas 77389.

7. Defendant SWN Water Resources Company, LLC is a Texas limited liability company with a principal place of business located at 10000 Energy Drive, Spring, Texas 77389.

8. Defendant SWN E & P Services, LLC, is a Texas limited liability company with a principal place of business located at 10000 Energy Drive, Spring, Texas 77389.

9. Defendant SWN Midstream Services Company, LLC is a Texas limited liability company with a principal place of business located at 10000 Energy Drive, Spring, Texas 77389.

10. Defendants SWN Well Services, LLC, SWN Drilling Company, LLC, SWN Energy Services Company, LLC, d/b/a SWN Marketing Company, SWN Production Company, LLC, SWN Water Resources Company, LLC, SWN E & P Services, LLC and SWN Midstream Services Company, LLC are subsidiaries of defendant, Southwestern Energy Company and all such defendants shall collectively be referred to herein as "SWN Energy defendants."

11. Defendant The Gorman-Rupp Company, (hereinafter "defendant Gorman-Rupp,") is an Ohio corporation with a principal place of business located at 600 South Airport Road, Mansfield, Ohio 44903.

12. Defendant J.G.B. Enterprises, Inc. (hereinafter "defendant JGB Enterprises") is a New York corporation with a principal place of business located at 115 Metropolitan Drive, Liverpool, New York 13088.

13. Defendant Campbell Fittings, Inc. (hereinafter “defendant Campbell Fittings”) is a Pennsylvania corporation with a principal place of business located at 301 South Washington Street, Boyertown, Pennsylvania 19512.

14. Defendants Daniel Durig and Rhonda Durig, are adult individuals, at all relevant times married, residing at 3116 Macedonia Ridge Road, New Martinsville, West Virginia 26155 and at all relevant times owned, leased, controlled or otherwise had possession and/or control of the premises located at 2960 Macedonia Ridge Road, New Martinsville, West Virginia 26155, which contained Daniel Durig’s wells 101H and 105H.

15. The SWN Energy defendants are hydraulic fracturing companies that are engaged in natural gas development, production, gathering and marketing.

16. At all relevant times, all defendants regularly conducted business in West Virginia, gaining substantial revenue therefrom.

17. At all relevant times, the SWN Energy defendants designed, constructed, owned, possessed, controlled, operated, managed, inspected, repaired and maintained the Daniel Durig WTZ 101H and 105H oil and gas wells located at 2960 Macedonia Ridge Road, New Martinsville, Wetzel County, West Virginia 26155 (hereinafter the “premises”).

18. At all relevant times, defendant Gorman-Rupp designed, manufactured, inspected, tested, sold, marketed and supplied various pumps to aid in the extraction of natural gas including The Gorman Gorman-Rupp PAH Series boost pump model PAH8A60-6090H (hereinafter the “pump,”) which was used by the SWN Energy defendants to transfer water to the wire line during perforating operations on the premises.

19. At all relevant times, defendant JGB Enterprises designed, manufactured, inspected, tested, sold, marketed and supplied industrial hoses including the 8” Eagle Oilflex 150 PSI WP

(hereinafter the “hose”) which was used by the SWN Energy defendants to transfer water to the wire line during perforating operations and was connected to the at issue pump.

20. At all relevant times, defendant Campbell Fittings designed, manufactured, inspected, tested, sold, marketed and supplied hose accessories such as fittings, couplings and ferrules to serve as fitting and connecting devices for industrial hoses to connect to pumps, including the at issue hose connecting device (hereinafter “connecting device”) that connected the hose to the pump on the premises.

21. At all relevant times, all defendants were acting by and through their authorized agents, ostensible agents, employees, workers, servants, contractors and subcontractors.

22. At all relevant times, and as part of their natural gas extraction operations on the premises, the SWN Energy defendants owned, possessed, controlled, operated, managed, inspected, repaired and maintained the pump, hose and connecting device jointly with Durig defendants.

23. At all relevant times, the SWN Energy defendants had a duty, or an implied duty, to implement safety policies, procedures and protocols for handling drilling operations and to prevent injuries to workers on the well site jointly Durig defendants.

24. On July 7, 2018, and at all relevant times, plaintiff was employed by the SWN Energy defendants and was working on the premises as a blender operator.

25. At approximately 4:05 p.m. the pump was started in preparation of pump-down to begin the drilling operations.

26. At all relevant times, the pump was being operated while both the intake and discharge valves were closed, which presented a dangerous, hazardous and unsafe condition as it allowed for a high level of pressure to build in the pump.

27. Additionally, the connecting device being used was the incorrect size for the hose and pump.

28. The connecting device was also not designed to adequately withstand high pressure as defendant Campbell Fittings recommends that it should only be used for low pressure air operations.

29. At approximately 4:39 p.m. the wire line and frac line pressures were equalizing and a decision was made to stop the wire line and shut off the pump.

30. The pump operator did not shut off the pump but instead radioed for someone else to shut it off.

31. Approximately 30 minutes later, the pump had yet to be shut off.

32. At approximately 5:13 p.m. plaintiff noticed that the pump was still running and asked his boss if it was supposed to be running.

33. After confirming with his boss that the pump was not supposed to be running, plaintiff went to go shut it off.

34. As plaintiff went to shut off the pump, the pump exploded causing the connecting device to fail and the hose on the suction side of the pump to disconnect.

35. Now disconnected, the hose viciously struck plaintiff on his leg releasing hot steam from the hose causing severe burns and other serious injuries to plaintiff.

36. None of the defendants, including the SWN defendants, all of whom had knowledge and experience in fracking, hydraulics and the use of pumps, required the use of or even suggested the use of whip locks or other similar products, which are and were readily available on the market, to prevent pressurized lines from swinging violently when there was a catastrophic failure such as this.

37. The protective coveralls that plaintiff was wearing, which were supplied by the SWN Energy defendants, failed to protect the hot steam from coming into contact with plaintiff's skin.

38. Instead, the coveralls caused heat and steam to be trapped between plaintiff's skin and his clothing, which worsened the degree of burns he suffered.

39. As a direct and proximate result of the negligence, carelessness and recklessness of defendants, plaintiff sustained the following serious injuries, some or all of which may be permanent:

- a) Second degree burns of his left arm and left side of body;
- b) Second degree burns to his stomach;
- c) Second degree burns to his right leg;
- d) Blistering and epidermal loss from burns;
- e) Compound fracture of left tibia with bone protruding;
- f) Compound fracture of left fibula with bone protruding;
- g) Amputation of left foot and lower leg;
- h) Bruises, contusions and other injuries in or about nerves, muscles, bones, tendons, ligaments, tissues and vessels of the body;
- i) Nervousness, emotional tension, anxiety and depression; and
- j) Other injuries to be proven at trial.

40. As a direct and proximate result of the negligence, carelessness and recklessness of defendants, plaintiff sustained the following damages, some or all of which may be continuing:

- a) He has endured great pain, suffering, inconvenience, embarrassment, mental anguish, and emotional and psychological trauma;
- b) He has been and will be required to expend large sums of money for medical treatment and care, hospitalization, medical supplies, surgical appliances, rehabilitation and therapeutic treatment, medicines, and other attendant services;
- c) His general health, strength and vitality have been impaired;

- d) Permanent scarring resulting from his burn injuries;
- e) Serious disfigurement resulting from his lower left leg and foot amputation which has caused permanent loss and/or significant impairment of the function of his legs;
- f) He has sustained and will continue to sustain lost earnings and his earning capacity has been and may be permanently impaired; and
- g) He has been and will in the future be unable to enjoy various pleasures of life that he previously enjoyed.

COUNT I

Plaintiff v. Southwestern Energy Company, SWN Well Services, LLC, SWN Drilling Company, LLC, SWN Energy Services Company, LLC, d/b/a SWN Marketing Company, SWN Production Company, LLC, SWN Water Resources Company, LLC, SWN E & P Services, LLC and SWN Midstream Services Company, LLC
Deliberate Intent Action
West Virginia Code Section 23-4-2

- 41. All preceding paragraphs of this complaint are incorporated by reference.
- 42. At all relevant times, SWN Energy defendants employed plaintiff as a blender operator on the premises.
- 43. SWN Energy defendants were responsible for the inspection, maintenance, supervision, upkeep, repairs, work site safety, and overall safety on the premises with one or more of the other defendants.
- 44. At all relevant times, SWN Energy defendants were West Virginia employers subject to the duties and responsibilities set forth in West Virginia Code Section 23-4-2 *et. seq.* by operation of law and pursuant to contractual terms among the parties.
- 45. At all relevant times, SWN Energy defendants acted with a consciously, subjectively and deliberately formed intention to produce the specific result of injury to plaintiff.

46. At all relevant times, there existed specific unsafe working conditions on the premises at the aformentioned time and place, which presented a high degree of risk and a strong possibility of serious injury or death to individuals such as plaintiff.

47. Plaintiff hereby incorporates and adopts by reference any and all facts, information, and opinions in the attached Statement of Mark A. Sokalski against SWN Energy defendants and all other defendants, a copy of which is attached hereto as Exhibit "A."

48. These specific unsafe working conditions included but are not limited to the following:

- a) SWN Energy defendants allowed the pump to be operated while both the intake and discharge valves were closed, which allowed an unsafe and hazardous amount of pressure to build in the pump;
- b) SWN Energy defendants failed to install a "low-flow" shutoff device on the pump to be used during pump down operations;
- c) SWN Energy defendants failed to install a device on the pump which would have stopped the pump at a preset temperature and pressure limit;
- d) SWN Energy defendants failed to install a remote operating panel for the pump;
- e) SWN Energy defendants failed to install a pressure gauge on the pump;
- f) SWN Energy defendants failed to implement a standalone boost pump exclusion zone, which would prevent individuals from being in close proximity to the pump during pump down operations;
- g) SWN Energy defendants installed a connecting device that was incorrectly sized and was unable to sustain connection between the hose and pump when exposed to high pressure;
- h) SWN Energy defendants installed a connecting device that was not manufactured and designed for high pressure drilling operations;
- i) SWN Energy defendants improperly installed the connecting device, which caused the hose to become disconnected from the pump when exposed to high pressure;

- j) SWN Energy defendants failed to complete competency evaluations for its employees who were responsible for operating the pump;
- k) SWN Energy defendants failed to implement safe and sufficient engineering controls during pump down operations;
- l) Employees of SWN Energy defendants were exposed to defective products including but not limited to the pump, hose and connecting device;
- m) SWN Energy defendants failed to properly repair, replace or maintain the defective pump, hose and connecting device;
- n) SWN Energy defendants failed to properly connect the hose to the pump and allowed the hose to become disconnected from the pump;
- o) SWN Energy defendants failed to properly warn employees of the risk of operating the defective pump, hose and connecting device;
- p) SWN Energy defendants allowed the defective pump, hose and connecting device to be operated by employees who were not qualified to operate such devices per their job responsibilities;
- q) SWN Energy defendants failed to provide adequate safety clothing and protective equipment to prevent its employees, including plaintiff, from being severely burned;
- r) The safety clothing and protective equipment that SWN Energy defendants provided to its employees, including plaintiff, was defective and hazardous in that it caused heat and steam to be trapped between the plaintiff's skin and his clothing which worsened the degree of burns he suffered;
- s) SWN Energy defendants failed to perform proper or adequate inspection, maintenance and safety at the work site in that it did not repair, replace or maintain the defective pump, hose and connecting device;
- t) SWN Energy defendants failed to promulgate safety procedures to ensure the safety of its employees and others at the worksite;
- u) SWN Energy defendants failed to instruct its employees and others at the worksite on guidelines and procedures for pump down operations;
- v) SWN Energy defendants failed to ensure that its employees were properly trained on how to connect the hose to the pump;
- w) SWN Energy defendants specifically allowed plaintiff to perform work that was inherently dangerous and exposed plaintiff to and caused great bodily harm;

- x) SWN Energy defendants did not warn plaintiff of the inherent dangers of operating the defective pump, hose and connecting device;
- y) SWN Energy defendants deviated from the standard of care in the industry by allowing an individual in plaintiff who was not trained in operating the defective pump, hose and connecting device to use such devices to shut the pump off; and
- z) for other reasons to be proven at trial.

49. Upon information and belief, the SWN Energy defendants, prior to the at issue incident, had actual knowledge of the existence of such specific unsafe working conditions, and of the high degree of risk and the strong probability of serious injury presented by the aforementioned specific unsafe working conditions, as there were atleast two instances of pump connection failures in the week prior to the at issue incident.

50. Despite this knowledge, the SWN Energy defendants exposed plaintiff to the specific unsafe working conditions, which directly and proximately caused plaintiff's serious injuries as aforesaid.

51. The specific unsafe working conditions were in violation of West Virginia and federal safety laws, rules, regulations and statutes, and of commonly accepted and well known safety standards within the oil and natural gas industry, all of which were applicable to the particular work and working conditions involving plaintiff.

52. During plaintiff's employment, his supervisors, and authorized employees of SWN Energy defendants, supervised and directed plaintiff's work by allowing him to perform an inherently dangerous act without warning of the dangers attendant to the act.

WHEREFORE, plaintiff demands judgment against SWN Energy defendants in an amount in excess of \$35 million dollars, together with court costs, interest and all other relief permitted by this Court.

COUNT II

*Plaintiff vs. Southwestern Energy Company, SWN Well Services, LLC, SWN Drilling Company, LLC, SWN Energy Services Company, LLC, d/b/a SWN Marketing Company, SWN Production Company, LLC, SWN Water Resources Company, LLC, SWN E & P Services, LLC, SWN Midstream Services Company, LLC, Daniel Durig, and Rhonda Durig,
Negligence*

53. All preceding paragraphs of this complaint are incorporated by reference.

54. At all relevant times, there existed specific unsafe working conditions on the premises at the aforementioned time and place, which presented a high degree of risk and a strong possibility of serious injury or death to individuals such as plaintiff.

55. These specific unsafe working conditions included but are not limited to the following:

- a) SWN Energy and Durig defendants allowed the pump to be operated while both the intake and discharge valves were closed, which allowed an unsafe and hazardous amount of pressure to build in the pump;
- b) SWN Energy and Durig defendants failed to install a “low-flow” shutoff device on the pump to be used during pump down operations;
- c) SWN Energy and Durig defendants failed to install a device on the pump which would have stopped the pump at a preset temperature and pressure limit;
- d) SWN Energy and Durig defendants failed to install a remote operating panel for the pump;
- e) SWN Energy and Durig defendants failed to install a pressure gauge on the pump;
- f) SWN Energy and Durig defendants failed to implement a standalone boost pump exclusion zone, which would prevent individuals from being in close proximity to the pump during pump down operations;
- g) SWN Energy and Durig defendants installed a connecting device that was incorrectly sized and was unable to sustain connection between the hose and pump when exposed to high pressure;
- h) SWN Energy and Durig defendants installed a connecting device that was not manufactured and designed for high pressure drilling operations;

- i) SWN Energy and Durig defendants improperly installed the connecting device, which caused the hose to become disconnected from the pump when exposed to high pressure;
- j) SWN Energy and Durig defendants failed to complete competency evaluations for its employees who were responsible for operating the pump;
- k) SWN Energy and Durig defendants failed to implement safe and sufficient engineering controls during pump down operations;
- l) Employees of SWN Energy and Durig defendants were exposed to defective products including but not limited to the pump, hose and connecting device;
- m) SWN Energy and Durig defendants failed to properly repair, replace or maintain the defective pump, hose and connecting device;
- n) SWN Energy and Durig defendants failed to properly connect the hose to the pump and allowed the hose to become disconnected from the pump;
- o) SWN Energy and Durig defendants failed to properly warn employees of the risk of operating the defective pump, hose and connecting device;
- p) SWN Energy and Durig defendants allowed the defective pump, hose and connecting device to be operated by employees who were not qualified to operate such devices per their job responsibilities;
- q) SWN Energy and Durig defendants failed to provide adequate safety clothing and protective equipment to prevent its employees, including plaintiff, from being severely burned;
- r) The safety clothing and protective equipment that SWN Energy and Durig defendants provided to its employees, including plaintiff, was defective and hazardous in that it caused heat and steam to be trapped between the plaintiff's skin and his clothing which worsened the degree of burns he suffered;
- s) SWN Energy and Durig defendants failed to perform proper or adequate inspection, maintenance and safety at the work site in that it did not repair, replace or maintain the defective pump, hose and connecting device;
- t) SWN Energy and Durig defendants failed to promulgate safety procedures to ensure the safety of its employees and others at the worksite;
- u) SWN Energy and Durig defendants failed to instruct its employees and others at the worksite on guidelines and procedures for pump down operations;

- v) SWN Energy and Durig defendants failed to ensure that its employees were properly trained on how to connect the hose to the pump;
- w) SWN Energy and Durig defendants specifically allowed plaintiff to perform work that was inherently dangerous and exposed plaintiff to and caused great bodily harm;
- x) SWN Energy and Durig defendants did not warn plaintiff of the inherent dangers of operating the defective pump, hose and connecting device;
- y) SWN Energy and Durig defendants deviated from the standard of care in the industry by allowing an individual in plaintiff who was not trained in operating the defective pump, hose and connecting device to use such devices to shut the pump off; and
- z) for other reasons to be proven at trial.

56. Upon information and belief, the SWN Energy and Durig defendants, prior to the at issue incident, had actual knowledge of the existence of such specific unsafe working conditions, and of the high degree of risk and the strong probability of serious injury presented by the aforementioned specific unsafe working conditions, as there were atleast two instances of pump connection failures in the week prior to the at issue incident.

57. Despite this knowledge, the SWN Energy and Durig defendants exposed plaintiff to the specific unsafe working conditions, which directly and proximately caused plaintiff's serious injuries as aforesaid.

58. The specific unsafe working conditions were in violation of West Virginia and federal safety laws, rules, regulations and statutes, and of commonly accepted and well known safety standards within the oil and natural gas industry, all of which were applicable to the particular work and working conditions involving plaintiff.

59. During plaintiff's employment, his supervisors, and authorized employees of SWN Energy and Durig defendants, supervised and directed plaintiff's work by allowing him to perform an inherently dangerous act without warning of the dangers attendant to the act.

WHEREFORE, plaintiff demands judgment against SWN Energy and Durig defendants in an amount in excess of \$35 million dollars, together with court costs, interest and all other relief permitted by this Court.

COUNT III

Plaintiff vs. Defendants The Gorman-Rupp Company, JGB Enterprises, Inc. and Campbell Fittings, Inc.

Strict Products Liability

60. All preceding paragraphs are incorporated herein by reference.

61. Defendants Gorman-Rupp, JGB Enterprises and Campbell Fittings designed, manufactured, inspected, tested, sold, marketed and supplied the pump and/or respective parts including the hose and connecting device that comprised the pump when assembled.

62. At all relevant times, defendants Gorman-Rupp, JGB Enterprises and Campbell Fittings represented to SWN Energy defendants, plaintiff, and the public in general that the pump as assembled was, free from defects, and generally suitable for the purposes for which it was intended.

63. Contrary to defendants' representations, the pump as assembled, at the time it left defendants' control, was in a defective, hazardous, unsafe and dangerous condition, unfit for its intended use, and unreasonably dangerous to plaintiff and other users within the meaning of Section 402A of the Restatement of Torts (Second), *Morningstar v. Black and Decker*, and their interpretations under West Virginia law, both at the time it left control of defendants and on the day of the incident, generally, and based on the following particulars:

- a) The pump as assembled was designed and manufactured in such a manner that it produced pressure at hazardous, unsafe and dangerous levels;
- b) The pump as assembled was designed and manufactured in such a manner that it was caused to explode;

- c) The pump as assembled was designed and manufactured in such a manner that it did not have a means to automatically turn off after a specific length of time;
- d) The pump as assembled was able to be operated while both the intake and discharge valves were closed, which allowed an unsafe and hazardous amount of pressure to build in the pump;
- e) The pump as assembled failed to contain a “low-flow” shutoff device, which would safely turn the pump off during pump down operations;
- f) The pump as assembled failed to contain a device which would have stopped the pump at a preset temperature and pressure limit, thereby preventing the pump from reaching an unsafe and hazardous level of pressure;
- g) The pump as assembled failed to contain a remote operating panel for the pump;
- h) The pump as assembled contained an unsafe and incorrectly sized connecting device which caused the hose to become disconnected from the pump when exposed to high pressure;
- i) The connecting device was not able to safely withstand high pressure;
- j) The hose was unable to remain connected to the pump because an improper connecting device was used, which allowed the hose to become disconnected from the pump when exposed to high pressure;
- k) The pump as assembled, failed to contain adequate warnings or instructions with respect to its intended use in drilling operations;
- l) The pump as assembled did not contain a pressure gauge; and
- m) The pump as assembled was designed and manufactured in such a manner that it could not operate safely for its foreseeable intended use.

WHEREFORE, plaintiff demands compensatory and punitive damages against defendants Gorman-Rupp, JGB Enterprises and Campbell Fittings in an amount in excess of \$35 million dollars, together with court costs, interest and all other relief permitted by this Court.

COUNT IV

*Plaintiff vs. Defendant The Gorman-Rupp Company
Negligence*

64. All preceding paragraphs are incorporated herein by reference.

65. Defendant Gorman-Rupp, as the designer and manufacturer of the pump, had a duty to discover and repair any defects in the pump that were known, or discoverable in the exercise of ordinary care.

66. Plaintiff's injuries and damages were a direct and proximate result of defendant Gorman-Rupp's negligence, carelessness and recklessness in the following particulars:

- a) In failing to fix or repair any known or reasonably foreseeable defects or hazardous conditions relating to any parts, systems, devices or mechanisms relating to the pump;
- b) In failing to inspect the pump for any reasonably foreseeable defects or hazardous conditions relating to any parts, systems, devices or mechanisms relating to the pump;
- c) In failing to fix or repair any known or reasonably foreseeable defects or hazardous conditions relating to the pump;
- d) In failing to display or provide adequate warnings or instructions with respect to any parts, systems, devices or mechanism relating to the pump and their intended uses;
- e) In failing to ensure that the pump could operate successfully;
- f) In negligently replacing or repairing the pump;
- g) In failing to properly employ the instructions, manuals, or proper techniques necessary when installing, replacing, repairing, and/or servicing the pump;
- h) In failing to replace or repair worn out parts relating to the pump;
- i) In failing to notify, warn, or make known to the purchaser and ultimate user of the vehicle that there were defective and/or worn out devices, parts, systems, or mechanisms of the pump;
- j) In designing and manufacturing the pump in such a manner that it produced pressure at hazardous, unsafe and dangerous levels;

- k) In designing and manufacturing the pump in such a manner that it was caused to explode;
- l) In designing and manufacturing the pump in such a manner that it did not have a means to automatically turn off after a specific length of time;
- m) In designing and manufacturing the pump in such a manner that it was able to be operated while both the intake and discharge valves were closed, which allowed an unsafe and hazardous amount of pressure to build in the pump;
- n) In designing and manufacturing the pump in such a manner that it failed to contain a “low-flow” shutoff device, which would safely turn the pump off during pump down operations;
- o) In designing and manufacturing the pump in such a manner that it failed to contain a device which would have stopped the pump at a preset temperature and pressure limit, thereby preventing the pump from reaching an unsafe and hazardous level of pressure;
- p) In designing and manufacturing the pump in such a manner such that it failed to contain a remote operating panel;
- q) In designing and manufacturing the pump in such a manner that it failed to contain a pressure gauge;
- r) In designing and manufacturing the pump in such a manner that it could not operate safely for its foreseeable intended use; and
- s) In allowing the pump to be put into the stream of commerce when it knew or should have known the pump was defective, hazardous, or unnecessarily dangerous.

WHEREFORE, plaintiff demands compensatory and punitive damages against defendant Gorman-Rupp in an amount in excess of \$35 million dollars, together with court costs, interest and all other relief permitted by this Court.

COUNT V
Plaintiff vs. The Gorman-Rupp Company
Strict Products Liability

- 67. All preceding paragraphs are incorporated herein by reference.
- 68. Defendant Gorman-Rupp designed, manufactured, inspected, tested, sold, marketed and supplied the pump.

69. At all relevant times, defendant Gorman-Rupp represented to SWN Energy defendants, plaintiff, and the public in general that the pump was safe, free from defects, and generally suitable for the purposes for which it was intended.

70. Contrary to defendant Gorman-Rupp's representations, the pump, at the time it left defendant Gorman-Rupp's control, was in a defective, hazardous, unsafe and dangerous condition, unfit for its intended uses, and unreasonably dangerous to plaintiff and other users within the meaning of Section 402A of the Restatement of Torts (Second), *Morningstar v. Black and Decker*, and their interpretations under West Virginia law, both at the time it left control of defendant Gorman-Rupp and on the day of the incident, generally, and based on the following particulars:

- a) The pump was designed and manufactured in such a manner that it produced pressure at hazardous, unsafe and dangerous levels;
- b) The pump was designed and manufactured in such a manner that it was caused to explode;
- c) The pump was designed and manufactured in such a manner that it did not have a means to automatically turn off after a specific length of time;
- d) The pump was designed and manufactured in such a manner that it was able to be operated while both the intake and discharge valves were closed, which allowed an unsafe and hazardous amount of pressure to build in the pump;
- e) The pump failed to contain a "low-flow" shutoff device, which would safely turn the pump off during pump down operations;
- f) The pump failed to contain a device which would have stopped the pump at a preset temperature and pressure limit, thereby preventing the pump from reaching an unsafe and hazardous level of pressure;
- g) The pump failed to contain a remote operating panel for the pump; and
- h) The pump failed to contain adequate warnings or instructions with respect to its intended use in drilling operations;
- i) The pump failed to contain adequate warnings or instructions with respect to what type of connecting device was necessary to be installed for drilling operations and how said device was to be installed;

- j) The pump did not contain a pressure gauge; and
- k) The pump was designed and manufactured in such a manner that it could not operate safely for its foreseeable intended use.

71. The defective, hazardous, or unnecessarily dangerous condition of the pump sold by defendant Gorman-Rupp was the direct and proximate cause of plaintiff's injuries and the resultant damages.

WHEREFORE, plaintiff demands compensatory and punitive damages against defendant Gorman-Rupp in an amount in excess of \$35 million dollars, together with court costs, interest and all other relief permitted by this Court.

COUNT VI
Plaintiff vs. The Gorman-Rupp Company
Breach of Warranty

72. All preceding paragraphs are incorporated herein by reference.

73. At the time the pump was sold, defendant Gorman-Rupp was in the business of selling and marketing similar pumps and was a merchant of such.

74. In connection with the sale of the pump, defendant Gorman-Rupp provided the purchaser and subsequent purchasers and users an implied warranty of merchantability and maintained that the pump was fit for the ordinary purposes for which it was used.

75. Additionally, plaintiff relied on the representations made by defendant Gorman-Rupp that the pump would be fit and suitable for his particular purposes.

76. The pump supplied by defendant Gorman-Rupp was dangerous and defective at the time it left defendant Gorman-Rupp's control, and was unfit for the ordinary purposes for which it was to be used.

77. Due to the nature of the defect as alleged herein, plaintiff was unable to discover the nature of this defect until the time of the herein incident.

78. The injuries suffered by the plaintiff and the resultant damages were caused by a breach of the implied warranties of merchantability and fitness for a particular purpose extended to the purchasers and users by defendant Gorman-Rupp.

WHEREFORE, plaintiff demands compensatory and punitive damages against defendant Gorman-Rupp in an amount in excess of \$35 million dollars, together with court costs, interest and all other relief permitted by this Court.

COUNT VII

Plaintiff vs. JGB Enterprises Inc.
Negligence

79. All preceding paragraphs are incorporated herein by reference.

80. Defendant JGB Enterprises, as the designer and manufacturer of the hose, had a duty to discover and repair any defects in the hose that were known, or discoverable in the exercise of ordinary care.

81. Plaintiff's injuries and damages were a direct and proximate result of defendant JGB Enterprises's negligence, carelessness and recklessness in the following particulars:

- a) In failing to fix or repair any known or reasonably foreseeable defects or hazardous conditions relating to any parts, systems, devices or mechanisms relating to the hose;
- b) In designing and manufacturing the hose in such a manner that it was easily able to be disconnected from the pump, exposing individuals, including plaintiff, to danger;
- c) In failing to inspect the hose for any reasonably foreseeable defects or hazardous conditions relating to any parts, systems, devices or mechanisms relating to the hose;
- d) In failing to fix or repair any known or reasonably foreseeable defects or hazardous conditions relating to the hose;

- e) In failing to ensure that the hose could operate successfully without becoming detached when exposed to high pressure;
- f) In negligently replacing or repairing the hose;
- g) In failing to properly employ the instructions, manuals, or proper techniques necessary when installing, replacing, repairing, and/or servicing the hose;
- h) In failing to replace or repair worn out parts relating to the hose;
- i) In failing to provide and display adequate warnings or instructions with respect to the intended use of the hose in drilling operations;
- j) In failing to provide and display adequate warnings or instructions with respect to the connecting device necessary to properly connect the hose to a pump for drilling operations and how said device was to be installed;
- k) In failing to notify, warn, or make known to the purchaser and ultimate user of the vehicle that there were defective and/or worn out devices, parts, systems, or mechanisms of the hose; and
- l) In allowing to be put into the stream of commerce a hose which it knew or should have known was defective, hazardous, or unnecessarily dangerous.

WHEREFORE, plaintiff demands compensatory and punitive damages against defendant JGB Enterprises in an amount in excess of \$35 million dollars, together with court costs, interest and all other relief permitted by this Court.

COUNT VIII
Plaintiff vs. JGB Enterprises Inc.
Strict Products Liability

- 82. All preceding paragraphs are incorporated herein by reference.
- 83. Defendant JGB Enterprises designed, manufactured, inspected, tested, sold, marketed and supplied the hose.
- 84. At all relevant times, defendant JGB Enterprises represented to the SWN Energy defendants, plaintiff, and the public in general that the hose was safe, free from defects, and generally suitable for the purposes for which it was intended.

85. Contrary to defendant JGB Enterprise's representations, the hose, at the time it left defendant JGB Enterprise's control, was in a defective, hazardous, unsafe and dangerous condition, unfit for its intended uses, and unreasonably dangerous to plaintiff and other users within the meaning of Section 402A of the Restatement of Torts (Second), Morningstar v. Black and Decker, and their interpretations under West Virginia law, both at the time it left control of defendant JGB Enterprises and on the day of the incident, generally, and based on the following particulars:

- a) The hose was designed and manufactured in such a manner that it failed to safely and sufficiently stay connected to the pump during pump down operations;
- b) The hose was designed and manufactured in such a manner that it failed to withstand the pressure generated by the pump;
- c) The hose was designed and manufactured in such a manner that it was able to become detached from the pump;
- d) The hose failed to provide and display adequate warnings or instructions with respect to the intended use of the hose in drilling operations;
- e) The hose failed to provide and display adequate warnings or instructions with respect to the connecting device necessary to properly connect the hose to a pump for drilling operation and how said device was to be installed; and
- f) The hose was designed and manufactured in such a manner that it could not be used safely for its foreseeable intended uses.

86. The defective, hazardous, or unnecessarily dangerous condition of the hose sold by defendant JGB Enterprises was the direct and proximate cause of plaintiff's injuries and the resultant damages.

WHEREFORE, plaintiff demands compensatory and punitive damages against defendant JGB Enterprises in an amount in excess of \$35 million dollars, together with court costs, interest and all other relief permitted by this Court.

COUNT IX

Plaintiff vs. JGB Enterprises Inc.
Breach of Warranty

87. All preceding paragraphs are incorporated herein by reference.

88. At the time the hose was sold, defendant JGB Enterprises was in the business of selling and marketing similar hoses and was a merchant of such.

89. In connection with the sale of the hose, defendant JGB Enterprises provided the purchaser and subsequent purchasers and users an implied warranty of merchantability and maintained that the hose was fit for the ordinary purposes for which it was used.

90. Additionally, plaintiff relied on the representations made by defendant JGB Enterprises that the hose would be fit and suitable for his particular purposes.

91. The hose supplied by defendant JGB Enterprises was dangerous and defective at the time it left defendant JGB Enterprise's control, and was unfit for the ordinary purposes for which it was to be used.

92. Due to the nature of the defect as alleged herein, plaintiff was unable to discover the nature of this defect until the time of the herein incident.

93. The injuries suffered by the plaintiff and the resultant damages were caused by a breach of the implied warranties of merchantability and fitness for a particular purpose extended to the purchasers and users by defendant JGB Enterprises.

WHEREFORE, plaintiff demands compensatory and punitive damages against defendant JGB Enterprises in an amount in excess of \$35 million dollars, together with court costs, interest and all other relief permitted by this Court.

COUNT X

*Plaintiff vs. Campbell Fittings, Inc.
Negligence*

94. All preceding paragraphs are incorporated herein by reference.

95. Defendant Campbell Fittings, as the designer and manufacturer of the connecting device, had a duty to discover and repair any defects in the connecting device that were known, or discoverable in the exercise of ordinary care.

96. Plaintiff's injuries and damages were a direct and proximate result of defendant Campbell Fittings' negligence, carelessness and recklessness in the following particulars:

- a) In failing to fix or repair any known or reasonably foreseeable defects or hazardous conditions relating to any parts, systems, devices, or mechanisms relating to the connecting device;
- b) In being designed and manufactured in such a manner that the connecting device was unable to keep the hose connected to the pump;
- c) In failing to inspect the connecting device for any reasonably foreseeable defects or hazardous conditions relating to any parts, systems, devices, or mechanisms relating to the connecting device;
- d) In failing to fix or repair any known or reasonably foreseeable defects or hazardous conditions relating to the connecting device;
- e) In failing to ensure that the connecting device could successfully keep the hose connected to the pump when exposed to high pressure;
- f) In negligently replacing or repairing the connecting device or any parts, systems, devices, or mechanisms relating to the connecting device;
- g) In failing to properly employ the instructions, manuals, or proper techniques necessary when installing, replacing, repairing, and/or servicing the connecting device;
- h) In failing to replace or repair worn out parts, systems, devices, or mechanisms relating to the connecting device;
- i) In failing to provide and display adequate warnings or instructions with respect to the intended use of the connecting device;
- j) In failing to provide and display adequate warning that the connecting device was not able to be used safely in high pressure drilling operations;

- k) In failing to provide and display adequate warnings or instructions with respect to how the connecting device was to be installed;
- l) In failing to notify, warn, or make known to the purchaser and ultimate user of the connecting device that there were defective and/or worn out parts, devices, systems or mechanisms of the connecting device; and
- m) In allowing to be put into the stream of commerce a connecting device which it knew or should have known was defective, hazardous, or unnecessarily dangerous.

WHEREFORE, plaintiff demands compensatory and punitive damages against defendant Campbell Fittings in an amount in excess of \$35 million dollars, together with court costs, interest and all other relief permitted by this Court.

COUNT XI

Plaintiff vs. Campbell Fittings, Inc.
Strict Products Liability

97. All preceding paragraphs are incorporated herein by reference.

98. Defendant Campbell Fittings designed, manufactured, inspected, tested, sold, marketed and supplied the connecting device.

99. At all relevant times, defendant Campbell Fittings represented to SWN Energy defendants, plaintiff, and the public in general that the connecting device was safe, free from defects, and generally suitable for the purposes for which it was intended.

100. Contrary to defendant Campbell Fittings' representations, the connecting device, at the time it left defendant Campbell Fittings' control, was in a defective, hazardous, unsafe and dangerous condition, unfit for its intended uses, and unreasonably dangerous to plaintiff and other users within the meaning of Section 402A of the Restatement of Torts (Second), *Morningstar v. Black and Decker*, and their interpretations under West Virginia law, both at the time it left control of defendant Campbell Fittings and on the day of the incident, generally, and based on the following particulars:

- a) The connecting device was designed and manufactured in such a manner that it failed to successfully keep the hose attached to the pump;
- b) The connecting device was designed and manufactured in such a manner that it failed to withstand high pressure generated by the pump;
- c) The connecting device failed to provide and display adequate warnings or instructions with respect to the intended use of the connecting device;
- d) The connecting device failed to provide and display adequate warning that the connecting device was not able to be used safely in high pressure drilling operations;
- e) The connecting device failed to provide and display adequate warnings or instructions with respect to how the connecting device was to be installed; and
- f) The connecting device was designed and manufactured in such a manner that it could not be used safely for its foreseeable intended use.

101. The defective, hazardous, or unnecessarily dangerous conditions of the connecting device sold by defendant Campbell Fittings were the direct and proximate cause of plaintiff's injuries and the resultant damages.

WHEREFORE, plaintiff demands compensatory and punitive damages against defendant Campbell Fittings in an amount in excess of \$35 million dollars, together with court costs, interest and all other relief permitted by this Court.

COUNT XII
Plaintiff vs. Campbell Fittings, Inc.
Breach of Warranty

102. All preceding paragraphs are incorporated herein by reference.

103. At the time the connecting device was sold, defendant Campbell Fittings was in the business of selling and marketing similar connecting devices and was a merchant of such.

104. In connection with the sale of the connecting device, defendant Campbell Fittings provided the purchaser and subsequent purchasers and users an implied warranty of

merchantability and maintained that the connecting device was fit for the ordinary purposes for which it was used.

105. Additionally, plaintiff relied on the representations made by defendant Campbell Fittings that the connecting device would be fit and suitable for his particular purposes.

106. The connecting device supplied by defendant Campbell Fittings was dangerous and defective at the time it left defendant Campbell Fittings' control, and was unfit for the ordinary purposes for which it was to be used.

107. Due to the nature of the defect as alleged herein, plaintiff was unable to discover the nature of this defect until the time of the herein incident.

108. The injuries suffered by the plaintiff and the resultant damages were caused by a breach of the implied warranties of merchantability and fitness for a particular purpose extended to the purchasers and users by defendant Campbell Fittings.

WHEREFORE, plaintiff demands compensatory and punitive damages against defendant Campbell Fittings in an amount in excess of \$35 million dollars, together with court costs, interest and all other relief permitted by this Court.

A JURY TRIAL IS DEMANDED.

Respectfully submitted,



Peter D. Friday, Esquire
WV ID # 5005

pfriday@fridaylaw.com

Kevin S. Burger, Esquire

WV ID #7290

kburger@fridaylaw.com

Friday & Cox, LLC

1405 McFarland Road

Pittsburgh, PA 15216-2320

(412) 561-4290

20-C-29

VERIFIED STATEMENT OF MARK A. SOKALSKI

1. My knowledge and expertise of the applicable workplace safety statutes, rules, regulations and/or written consensus industry safety standards is as follows: Best workplace safety practices requires all incidents of equipment failure, especially repeated incidents of failure, to be investigated for proximate cause. SWN Well Safety Plan, 2/8/2017 apparently was not being followed by the Senior Service supervisors and above managers.

OSHA 29CFR 1903.1 Purpose and Scope

The Williams-Steiger Occupational Safety and Health Act of 1970 (84 Stat. 1590 et seq., 29 U.S.C. 651 et seq.) requires, in part, that every employer covered under the Act furnish to his employees employment and a place of employment which are free from recognized hazards that are causing or are likely to cause death or serious physical harm to his employees.

Excerpts from SWN's Daniel Durig WTZ Well Site Safety Plan, dated 2/8/2017:

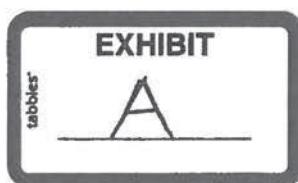
- C. Discussions between the rig toolpusher and well site supervisor will occur at least twice per day during the tourly HSE Meetings and will cover all pertinent aspects of operations, health, safety, and environmental issues. The well site supervisor and drilling engineer will be in daily contact with the SWN Drilling Department via phone and/or email and will discuss all pertinent operations and HSE issues.

1. WVDEP Oil and Gas Inspector: (b) (7)(C)
2. Personnel in attendance for the pre-spud meeting:

Drilling
Land
HSE
Regulatory
Geology
Drilling Contractor Representative
Directional Company Representative (if needed)
Drilling Fluids Representative (if needed)
Cementing Company Representative (if needed)

- D. HSE meetings will be conducted once per tour and will include all personnel working on location. HSE meetings will cover upcoming operations, JSAs for critical operations, recent HSE incidents, and requirements for safe and healthy operations during current weather conditions. Corporate HSE alerts and rig fleet corrective actions in response to recent HSE incidents will also be discussed when applicable.

These plans were not followed by the employer.



2. The specific unsafe working condition(s) that were the cause of the injury that is the basis of the complaint are: **Per my phone discussion of 7/2/2020 with Love C. Savior (field supervisor), at least three occurrences of the suction hose to the booster pump had separated at an 8-inch swaged ferrule fitting had occurred prior to the injury to Jeff Blaniar. The 8-inch hose had a working pressure rating of 150 psig and a burst pressure rating around 600 psig. Since this suction hose operated around 60 psig or less, the hose has a burst safety factor of at least 10. Also, the hose itself should fail (split) prior to the fitting catastrophically separating.** These repeated incidents, where no one was injured, were “red flag” warnings of an unsafe working condition and required a detailed forensic investigation by management and the hose-to-fitting assembler. No investigations were performed and a duplicate hose was installed. Without correcting the problems, the incident was obviously going to continue to occur until someone gets injured.
3. The specific statutes, rules, regulations or written consensus industry safety standards violated by the employer that are directly related to the specific unsafe working conditions are **SWN continued a booster pump operation where it was known that the suction hose had failed numerous times even though the hose had 10 times burst safety factor.**

OSHA 29 USC 654 Duties of employers and employee

(a) Each employer --

- (1) shall furnish to each of his employees, employment and a place of employment, which are free from recognized hazards that are causing or are likely to cause death or serious physical harm to his employees;**

(2) shall comply with occupational safety and health standards promulgated under this Act.

(b) Each employee shall comply with occupational safety and health standards and all rules, regulations, and orders issued pursuant to this Act which are applicable to his own actions and conduct.

One of the "root causes" of workplace injuries is the failure to identify or recognize hazards that are present or that could have been anticipated. A critical element of any effective safety and health program is a proactive, ongoing process to identify and assess such hazards.

To identify and assess hazards, employers, and workers:

- Collect and review information about the hazards present or likely to be present in the workplace.
- Conduct initial and periodic workplace inspections of the workplace to identify new or recurring hazards.
- Investigate injuries, incidents, and close calls/near misses to determine the underlying hazards, their causes, and safety and health program shortcomings.
- Group similar incidents and identify trends in injuries, illnesses, and hazards reported.
- Determine the severity and likelihood of incidents that could result and use this information to prioritize corrective actions.

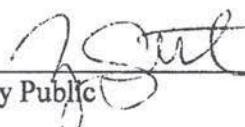
SWN knew or should have known that there was a high potential for another occurrence of a catastrophic hose-to-fitting separation on the suction hose to the booster pump. SWN knew or should have known that there was a high potential a significant injury to occur when the next catastrophic hose-to-fitting separation on the suction hose to the booster pump occurs.



Mark A. Sokalski

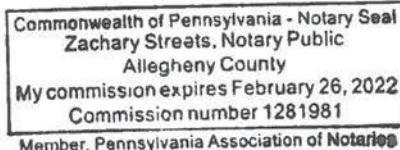
State of Pennsylvania
County of Allegheny

Before me on this 2nd day of July, 2020, personally appeared Mark A. Sokalski.



Notary Public

My commission expires: 2/26/22



**SUMMONS
CIRCUIT COURT OF WETZEL COUNTY, WEST VIRGINIA**

JEFFREY BLANIAR
Plaintiffs

VS

CIVIL ACTION NO: **20-C-29**
Judge: *Cramer*

**SOUTHWESTERN ENERGY COMPANY
SWN WELL SERVICES LLC ET-AL**
Defendant

Please Serve:
**SOUTHWESTERN ENERGY COMPANY
10000 ENERGY DR
SPRING TEXAS 77389**

To the above named Defendant:

IN THE NAME OF THE STATE OF WEST VIRGINIA, you are hereby
Summoned and required to serve upon the Plaintiff's Attorney

**PETER D. FRIDAY
FRIDAY & COX LLC
1405 MCFARLAND RD
PITTSBURG PA 15216**

an answer including any related counterclaim you may have, to the complaint filed
against you in the above-styled civil action, a true copy of which is herewith
delivered to you. You are required to serve your answer within **30 Days** after
service of this summons upon you exclusive of the day of service. If you fail to do
so, judgment by default may be taken against you for the relief demanded in the
complaint and you will be thereafter barred from asserting in another action any
claim you may have which must be asserted by counterclaim in the above style civil
action.

Dated: July 7, 2020

Joni G. McCloy
Wetzel County Circuit Clerk



**SUMMONS
CIRCUIT COURT OF WETZEL COUNTY, WEST VIRGINIA**

JEFFREY BLANIAR
Plaintiffs

VS

CIVIL ACTION NO: **20-C-29**
Judge: **Cramer**

**SOUTHWESTERN ENERGY COMPANY
SWN WELL SERVICES LLC ET-AL**
Defendant

Please Serve:
**SWN WELL SERVICES LLC
10000 ENERGY DRIVE
SPRING TEXAS 77389**

To the above named Defendant:

IN THE NAME OF THE STATE OF WEST VIRGINIA, you are hereby
Summoned and required to serve upon the Plaintiff's Attorney

**PETER D. FRIDAY
FRIDAY & COX LLC
1405 MCFARLAND RD
PITTSBURG PA 15216**

an answer including any related counterclaim you may have, to the complaint filed
against you in the above-styled civil action, a true copy of which is herewith
delivered to you. You are required to serve your answer within **30 Days** after
service of this summons upon you exclusive of the day of service. If you fail to do
so, judgment by default may be taken against you for the relief demanded in the
complaint and you will be thereafter barred from asserting in another action any
claim you may have which must be asserted by counterclaim in the above style civil
action.

Dated: July 7, 2020


Wetzel County Circuit Clerk



**SUMMONS
CIRCUIT COURT OF WETZEL COUNTY, WEST VIRGINIA**

JEFFREY BLANIAR
Plaintiffs

VS

CIVIL ACTION NO: **20-C-29**
Judge: **Cramer**

**SOUTHWESTERN ENERGY COMPANY
SWN WELL SERVICES LLC ET-AL**
Defendant

Please Serve:
**SWN DRILLING COMPANY LLC
10000 ENERGY DRIVE
SPRING TEXAS 77389**

To the above named Defendant:

IN THE NAME OF THE STATE OF WEST VIRGINIA, you are hereby
Summoned and required to serve upon the Plaintiff's Attorney

**PETER D. FRIDAY
FRIDAY & COX LLC
1405 MCFARLAND RD
PITTSBURG PA 15216**

an answer including any related counterclaim you may have, to the complaint filed
against you in the above-styled civil action, a true copy of which is herewith
delivered to you. You are required to serve your answer within **30 Days** after
service of this summons upon you exclusive of the day of service. If you fail to do
so, judgment by default may be taken against you for the relief demanded in the
complaint and you will be thereafter barred from asserting in another action any
claim you may have which must be asserted by counterclaim in the above style civil
action.

Dated: July 7, 2020


Lori G. McCoy
Wetzel County Circuit Clerk



**SUMMONS
CIRCUIT COURT OF WETZEL COUNTY, WEST VIRGINIA**

JEFFREY BLANIER
Plaintiffs

VS

CIVIL ACTION NO: **20-C-29**
Judge: **Cramer**

**SOUTHWESTERN ENERGY COMPANY
SWN WELL SERVICES LLC ET-AL**
Defendant

Please Serve:
**SWN ENERGY SERVICES COMPANY LLC
10000 ENERGY DRIVE
SPRING TEXAS 77389**

To the above named Defendant:

IN THE NAME OF THE STATE OF WEST VIRGINIA, you are hereby
Summoned and required to serve upon the Plaintiff's Attorney

**PETER D. FRIDAY
FRIDAY & COX LLC
1405 MCFARLAND RD
PITTSBURG PA 15216**

an answer including any related counterclaim you may have, to the complaint filed
against you in the above-styled civil action, a true copy of which is herewith
delivered to you. You are required to serve your answer within **30 Days** after
service of this summons upon you exclusive of the day of service. If you fail to do
so, judgment by default may be taken against you for the relief demanded in the
complaint and you will be thereafter barred from asserting in another action any
claim you may have which must be asserted by counterclaim in the above style civil
action.

Dated: July 7, 2020


Wetzel County Circuit Clerk



**SUMMONS
CIRCUIT COURT OF WETZEL COUNTY, WEST VIRGINIA**

JEFFREY BLANIAR
Plaintiffs

VS

CIVIL ACTION NO: **20-C-29**
Judge: **Cramer**

**SOUTHWESTERN ENERGY COMPANY
SWN WELL SERVICES LLC ET-AL**
Defendant

Please Serve:
**SWN PRODUCTION COMPANY LLC
10000 ENERGY DRIVE
SPRING TEXAS 77389**

To the above named Defendant:

IN THE NAME OF THE STATE OF WEST VIRGINIA, you are hereby
Summoned and required to serve upon the Plaintiff's Attorney

**PETER D. FRIDAY
FRIDAY & COX LLC
1405 MCFARLAND RD
PITTSBURG PA 15216**

an answer including any related counterclaim you may have, to the complaint filed
against you in the above-styled civil action, a true copy of which is herewith
delivered to you. You are required to serve your answer within **30 Days** after
service of this summons upon you exclusive of the day of service. If you fail to do
so, judgment by default may be taken against you for the relief demanded in the
complaint and you will be thereafter barred from asserting in another action any
claim you may have which must be asserted by counterclaim in the above style civil
action.

Dated: July 7, 2020


Wetzel County Circuit Clerk



**SUMMONS
CIRCUIT COURT OF WETZEL COUNTY, WEST VIRGINIA**

JEFFREY BLANIAR
Plaintiffs

VS

CIVIL ACTION NO: **20-C-29**
Judge: **Cramer**

**SOUTHWESTERN ENERGY COMPANY
SWN WELL SERVICES LLC ET-AL**
Defendant

Please Serve:
**SWN WATER RESOURCES COMPANY LLC
10000 ENERGY DRIVE
SPRING TEXAS 77389**

To the above named Defendant:

IN THE NAME OF THE STATE OF WEST VIRGINIA, you are hereby
Summoned and required to serve upon the Plaintiff's Attorney

**PETER D. FRIDAY
FRIDAY & COX LLC
1405 MCFARLAND RD
PITTSBURG PA 15216**

an answer including any related counterclaim you may have, to the complaint filed
against you in the above-styled civil action, a true copy of which is herewith
delivered to you. You are required to serve your answer within **30 Days** after
service of this summons upon you exclusive of the day of service. If you fail to do
so, judgment by default may be taken against you for the relief demanded in the
complaint and you will be thereafter barred from asserting in another action any
claim you may have which must be asserted by counterclaim in the above style civil
action.

Dated: July 7, 2020


Wetzel County Circuit Clerk



**SUMMONS
CIRCUIT COURT OF WETZEL COUNTY, WEST VIRGINIA**

JEFFREY BLANIAR
Plaintiffs

VS

CIVIL ACTION NO: **20-C-29**
Judge: **Cramer**

**SOUTHWESTERN ENERGY COMPANY
SWN WELL SERVICES LLC ET-AL**
Defendant

Please Serve:
**SWN E&P SERVICES LLC
10000 ENERGY DRIVE
SPRING TEXAS 77389**

To the above named Defendant:

IN THE NAME OF THE STATE OF WEST VIRGINIA, you are hereby
Summoned and required to serve upon the Plaintiff's Attorney

**PETER D. FRIDAY
FRIDAY & COX LLC
1405 MCFARLAND RD
PITTSBURG PA 15216**

an answer including any related counterclaim you may have, to the complaint filed
against you in the above-styled civil action, a true copy of which is herewith
delivered to you. You are required to serve your answer within **30 Days** after
service of this summons upon you exclusive of the day of service. If you fail to do
so, judgment by default may be taken against you for the relief demanded in the
complaint and you will be thereafter barred from asserting in another action any
claim you may have which must be asserted by counterclaim in the above style civil
action.

Dated: July 7, 2020


Wetzel County Circuit Clerk



**SUMMONS
CIRCUIT COURT OF WETZEL COUNTY, WEST VIRGINIA**

JEFFREY BLANIAR
Plaintiffs

VS

CIVIL ACTION NO: **20-C-29**
Judge: **Cramer**

**SOUTHWESTERN ENERGY COMPANY
SWN WELL SERVICES LLC ET-AL**
Defendant

Please Serve:
**SWN MIDSTREAM SERVICES CO LLC
10000 ENERGY DRIVE
SPRING TEXAS 77389**

To the above named Defendant:

IN THE NAME OF THE STATE OF WEST VIRGINIA, you are hereby
Summoned and required to serve upon the Plaintiff's Attorney

**PETER D. FRIDAY
FRIDAY & COX LLC
1405 MCFARLAND RD
PITTSBURG PA 15216**

an answer including any related counterclaim you may have, to the complaint filed
against you in the above-styled civil action, a true copy of which is herewith
delivered to you. You are required to serve your answer within **30 Days** after
service of this summons upon you exclusive of the day of service. If you fail to do
so, judgment by default may be taken against you for the relief demanded in the
complaint and you will be thereafter barred from asserting in another action any
claim you may have which must be asserted by counterclaim in the above style civil
action.

Dated: July 7, 2020


Lori G. McCoy
Wetzel County Circuit Clerk



**SUMMONS
CIRCUIT COURT OF WETZEL COUNTY, WEST VIRGINIA**

JEFFREY BLANIAR
Plaintiffs

VS

CIVIL ACTION NO: **20-C-29**
Judge: **Cramer**

**SOUTHWESTERN ENERGY COMPANY
SWN WELL SERVICES LLC ET-AL**
Defendant

Please Serve:
**THE GORMAN-RUPP COMPANY
600 SOUTH AIRPORT RD
MANSFIELD OH 44903**

To the above named Defendant:

IN THE NAME OF THE STATE OF WEST VIRGINIA, you are hereby
Summoned and required to serve upon the Plaintiff's Attorney

**PETER D. FRIDAY
FRIDAY & COX LLC
1405 MCFARLAND RD
PITTSBURG PA 15216**

an answer including any related counterclaim you may have, to the complaint filed
against you in the above-styled civil action, a true copy of which is herewith
delivered to you. You are required to serve your answer within **30 Days** after
service of this summons upon you exclusive of the day of service. If you fail to do
so, judgment by default may be taken against you for the relief demanded in the
complaint and you will be thereafter barred from asserting in another action any
claim you may have which must be asserted by counterclaim in the above style civil
action.

Dated: July 7, 2020


Wetzel County Circuit Clerk



**SUMMONS
CIRCUIT COURT OF WETZEL COUNTY, WEST VIRGINIA**

JEFFREY BLANIAR
Plaintiffs

VS

CIVIL ACTION NO: **20-C-29**
Judge: **Cramer**

**SOUTHWESTERN ENERGY COMPANY
SWN WELL SERVICES LLC ET-AL**
Defendant

Please Serve:
**JGB ENTERPRISES INC
115 METROPOLOITAN DRIVE
LIVERPOOL NEW YORK 13088**

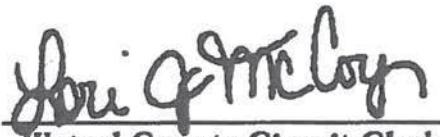
To the above named Defendant:

IN THE NAME OF THE STATE OF WEST VIRGINIA, you are hereby
Summoned and required to serve upon the Plaintiff's Attorney

**PETER D. FRIDAY
FRIDAY & COX LLC
1405 MCFARLAND RD
PITTSBURG PA 15216**

an answer including any related counterclaim you may have, to the complaint filed
against you in the above-styled civil action, a true copy of which is herewith
delivered to you. You are required to serve your answer within **30 Days** after
service of this summons upon you exclusive of the day of service. If you fail to do
so, judgment by default may be taken against you for the relief demanded in the
complaint and you will be thereafter barred from asserting in another action any
claim you may have which must be asserted by counterclaim in the above style civil
action.

Dated: July 7, 2020


Lori G. McWayne
Wetzel County Circuit Clerk



**SUMMONS
CIRCUIT COURT OF WETZEL COUNTY, WEST VIRGINIA**

JEFFREY BLANIAR
Plaintiffs

VS

CIVIL ACTION NO: **20-C-29**
Judge: **Cramer**

**SOUTHWESTERN ENERGY COMPANY
SWN WELL SERVICES LLC ET-AL**
Defendant

Please Serve:
**CAMPBELL FITTINGS INC
301 SOUTH WASHINGTON ST
BOYERTOWN PA 19512**

To the above named Defendant:

IN THE NAME OF THE STATE OF WEST VIRGINIA, you are hereby
Summoned and required to serve upon the Plaintiff's Attorney

**PETER D. FRIDAY
FRIDAY & COX LLC
1405 MCFARLAND RD
PITTSBURG PA 15216**

an answer including any related counterclaim you may have, to the complaint filed
against you in the above-styled civil action, a true copy of which is herewith
delivered to you. You are required to serve your answer within **30 Days** after
service of this summons upon you exclusive of the day of service. If you fail to do
so, judgment by default may be taken against you for the relief demanded in the
complaint and you will be thereafter barred from asserting in another action any
claim you may have which must be asserted by counterclaim in the above style civil
action.

Dated: July 7, 2020

Jeri A. McCoy
Wetzel County Circuit Clerk



**SUMMONS
CIRCUIT COURT OF WETZEL COUNTY, WEST VIRGINIA**

JEFFREY BLANIAR

Plaintiff

VS

CIVIL ACTION NO: **20-C-29**
JUDGE: **CRAMER**

**SOUTHWESTERN ENERGY COMPANY
SWN WELL SERVICES LLC ET-AL**
Defendants

Please Serve:
**RHONDA DURIG
2960 MACEDONIA RIDGE
NEW MARTINSVILLE, WV 26155**

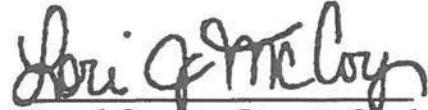
To the above named Defendant:

IN THE NAME OF THE STATE OF WEST VIRGINIA, you are hereby
Summoned and required to serve upon the Plaintiff's Attorney:

**PETER D. FRIDAY, ESQ.
FRIDAY & COX LLC
1405 MCFARNLAND ROAD
PITTSBURGH, PA 15216**

an answer including any related counterclaim you may have, to the complaint filed
against you in the above-styled civil action, a true copy of which is herewith
delivered to you. You are required to serve your answer within **20 Days** after
service of this summons upon you exclusive of the day of service. If you fail to do
so, judgment by default may be taken against you for the relief demanded in the
complaint and you will be thereafter barred from asserting in another action any
claim you may have which must be asserted by counterclaim in the above style civil
action.

Dated July 8, 2020


Wetzel County Circuit Clerk

**SUMMONS
CIRCUIT COURT OF WETZEL COUNTY, WEST VIRGINIA**

JEFFREY BLANIAR

Plaintiff

VS

CIVIL ACTION NO: **20-C-29**

JUDGE: **CRAMER**

**SOUTHWESTERN ENERGY COMPANY
SWN WELL SERVICES LLC ET-AL**
Defendants

Please Serve:

**DANIEL DURIG
2960 MACEDONIA RIDGE
NEW MARTINSVILLE, WV 26155**

To the above named Defendant:

IN THE NAME OF THE STATE OF WEST VIRGINIA, you are hereby Summoned and required to serve upon the Plaintiff's Attorney:

**PETER D. FRIDAY, ESQ.
FRIDAY & COX LLC
1405 MCFARNLAND ROAD
PITTSBURGH, PA 15216**

an answer including any related counterclaim you may have, to the complaint filed against you in the above-styled civil action, a true copy of which is herewith delivered to you. You are required to serve your answer within **20 Days** after service of this summons upon you exclusive of the day of service. If you fail to do so, judgment by default may be taken against you for the relief demanded in the complaint and you will be thereafter barred from asserting in another action any claim you may have which must be asserted by counterclaim in the above style civil action.

Dated July 8, 2020


Shari G. McCoy
Wetzel County Circuit Clerk

**SUMMONS
CIRCUIT COURT OF WETZEL COUNTY, WEST VIRGINIA**

ORIGINAL
Return

JEFFREY BLANIAR

Plaintiff

VS

CIVIL ACTION NO: **20-C-29**
JUDGE: **CRAMER**

**SOUTHWESTERN ENERGY COMPANY
SWN WELL SERVICES LLC ET-AL**
Defendants

Please Serve:

**DANIEL DURIG
2960 MACEDONIA RIDGE
NEW MARTINSVILLE, WV 26155**

To the above named Defendant:

IN THE NAME OF THE STATE OF WEST VIRGINIA, you are hereby Summoned and required to serve upon the Plaintiff's Attorney:

**PETER D. FRIDAY, ESQ.
FRIDAY & COX LLC
1405 MCFARNLAND ROAD
PITTSBURGH, PA 15216**

an answer including any related counterclaim you may have, to the complaint filed against you in the above-styled civil action, a true copy of which is herewith delivered to you. You are required to serve your answer within **20 Days** after service of this summons upon you exclusive of the day of service. If you fail to do so, judgment by default may be taken against you for the relief demanded in the complaint and you will be thereafter barred from asserting in another action any claim you may have which must be asserted by counterclaim in the above style civil action.

State of West Virginia 2020
County of Wetzel } To Wit:

Served the within summons and complaint on the within
named. *Daniel... Durig.....* by
delivering a copy of said summons and complaint to him in
person in Wetzel County, West Virginia on the *9* day
of *July*, *2020*.
Mike Koontz.....
Sheriff of Wetzel County, W. Va.
By Timothy Glasscock
His Deputy.



Wetzel County Circuit Clerk

ORIGINAL
Return

SUMMONS
CIRCUIT COURT OF WETZEL COUNTY, WEST VIRGINIA

JEFFREY BLANIAR

Plaintiff

VS

CIVIL ACTION NO: 20-C-29
JUDGE: CRAMER

SOUTHWESTERN ENERGY COMPANY
SWN WELL SERVICES LLC ET-AL
Defendants

Please Serve:

RHONDA DURIG
2960 MACEDONIA RIDGE
NEW MARTINSVILLE, WV 26155

To the above named Defendant:

IN THE NAME OF THE STATE OF WEST VIRGINIA, you are hereby
Summoned and required to serve upon the Plaintiff's Attorney:

PETER D. FRIDAY, ESQ.
FRIDAY & COX LLC
1405 MCFARNLAND ROAD
PITTSBURGH, PA 15216

an answer including any related counterclaim you may have, to the complaint filed
against you in the above-styled civil action, a true copy of which is herewith
delivered to you. You are required to serve your answer within **20 Days** after
service of this summons upon you exclusive of the day of service. If you fail to do
so, judgment by default may be taken against you for the relief demanded in the
complaint and you will be thereafter barred from asserting in another action any
claim you may have which must be asserted by counterclaim in the above style civil
action.

State of West Virginia, 2020 }
County of Wetzel } To Wit:

Served the within summons and complaint on the within
named *Cl... Daniel... Durig.....* by
delivering a copy of said summons and complaint to him in
person in Wetzel County, West Virginia on the *9* day
of *July*, *2020*.
Mike Koontz.....
Sheriff of Wetzel County, W. Va.
By *Timothy Glasscock.....*
His Deputy.

John G. McCoy
Wetzel County Circuit Clerk

Office of the Secretary of State
Building 1 Suite 157-K
1900 Kanawha Blvd E.
Charleston, WV 25305

ED

2020 JUL 17 AM 10:56

LORI MCCOY
CIRCUIT CLERK
WETZEL COUNTY, WV



Mac Warner

Secretary of State

State of West Virginia

Phone: 304-558-6000

888-767-8683

Visit us online:

www.wvsos.com

LORI WETZEL MCCOY
Wetzel County Courthouse
P. O. Box 263
New Martinsville, WV 26155-0263

Control Number: 259990

Defendant: SWN WELL SERVICES LLC
10000 ENERGY DRIVE
SPRING , TX 77389 US

County: Wetzel

Civil Action: 20-C-29

Certified Number: 92148901125134100002735125

Service Date: 7/13/2020

I am enclosing:

1 summons and complaint

which was served on the Secretary at the State Capitol as your statutory attorney-in-fact. According to law, I have accepted service of process in your name and on your behalf.

Please note that this office has no connection whatsoever with the enclosed documents other than to accept service of process in your name and on your behalf as your attorney-in-fact. Please address any questions about this document directly to the court or the plaintiff's attorney, shown in the enclosed paper, not to the Secretary of State's office.

Sincerely,

Mac Warner

Mac Warner
Secretary of State

To: Secretary of State
Building 1, Suite 157-K
1900 Kanawha Blvd., East
Charleston, WV 25305-0770

From: Lori J. McCoy
Circuit Clerk
P.O. Box 263
New Martinsville WV 26155

#20-C-29

PLAINTIFF: JEFFREY BLANTAR

VS.

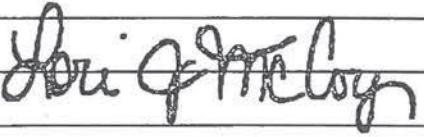
DEFENDANT: SOUTHWESTERN ENERGY COMPANY;
SWN WELL SERVICES, LLC. ET-AL

PLEASE ACCEPT SERVICE ON THE FOLLOWING:

SWN WELL SERVICES, LLC
10000 ENERGY DRIVE
SPRING, TEXAS 77389

A check for \$ 20/00 is enclosed. Thank you

SIGNED



SEAL

ORIGINAL

SUMMONS
CIRCUIT COURT OF WETZEL COUNTY, WEST VIRGINIA

JEFFREY BLANIAR
Plaintiffs

VS

CIVIL ACTION NO: **20-C-29**
Judge: *Cramer*

SOUTHWESTERN ENERGY COMPANY
SWN WELL SERVICES LLC ET-AL
Defendant

Please Serve:
SWN WELL SERVICES LLC
10000 ENERGY DRIVE
SPRING TEXAS 77389

To the above named Defendant:

IN THE NAME OF THE STATE OF WEST VIRGINIA, you are hereby
Summoned and required to serve upon the Plaintiff's Attorney

PETER D. FRIDAY
FRIDAY & COX LLC
1405 MCFARLAND RD
PITTSBURG PA 15216

an answer including any related counterclaim you may have, to the complaint filed
against you in the above-styled civil action, a true copy of which is herewith
delivered to you. You are required to serve your answer within **30 Days** after
service of this summons upon you exclusive of the day of service. If you fail to do
so, judgment by default may be taken against you for the relief demanded in the
complaint and you will be thereafter barred from asserting in another action any
claim you may have which must be asserted by counterclaim in the above style civil
action.

Dated: July 7, 2020

Lori G. McLoy
Wetzel County Circuit Clerk



Office of the Secretary of State
Building 1 Suite 157-K
1900 Kanawha Blvd E.
Charleston, WV 25305

ED
2020 JUL 17 AM 10:56

LORI MCCOY
CIRCUIT CLERK
WETZEL COUNTY, WV



Mac Warner

Secretary of State
State of West Virginia

Phone: 304-558-6000

886-767-8683

Visit us online:

www.wvsos.com

LORI WETZEL MCCOY
Wetzel County Courthouse
P. O. Box 263
New Martinsville, WV 26155-0263

Control Number: 259991

Defendant: SWN DRILLING COMPANY LLC
10000 ENERGY DRIVE
SPRING , TX 77389 US

County: Wetzel

Civil Action: 20-C-29

Certified Number: 92148901125134100002735132

Service Date: 7/13/2020

I am enclosing:

1 summons and complaint

which was served on the Secretary at the State Capitol as your statutory attorney-in-fact. According to law, I have accepted service of process in your name and on your behalf.

Please note that this office has no connection whatsoever with the enclosed documents other than to accept service of process in your name and on your behalf as your attorney-in-fact. Please address any questions about this document directly to the court or the plaintiff's attorney, shown in the enclosed paper, not to the Secretary of State's office.

Sincerely,

Mac Warner

Mac Warner
Secretary of State

To: Secretary of State
Building 1, Suite 157-K
1900 Kanawha Blvd., East
Charleston, WV 25305-0770

From: Lori J. McCoy
Circuit Clerk
P.O. Box 263
New Martinsville WV 26155

#20-C-29

PLAINTIFF: JEFFREY BLANIAR

VS.

DEFENDANT: SOUTHWESTERN ENERGY COMPANY;
SWN WELL SERVICES, LLC, ET-AL

PLEASE ACCEPT SERVICE ON THE FOLLOWING:

SWN DRILLING COMPANY, LLC
10000 ENERGY DRIVE
SPRING, TEXAS 77389

A check for \$ 20.00 is enclosed. Thank you

SIGNED

Lori J. McCoy

SEAL

ORIGINAL

SUMMONS
CIRCUIT COURT OF WETZEL COUNTY, WEST VIRGINIA

JEFFREY BLANIAR
Plaintiffs

VS

CIVIL ACTION NO: **20-C-29**
Judge: **Cramer**

**SOUTHWESTERN ENERGY COMPANY
SWN WELL SERVICES LLC ET-AL**
Defendant

Please Serve:
**SWN DRILLING COMPANY LLC
10000 ENERGY DRIVE
SPRING TEXAS 77389**

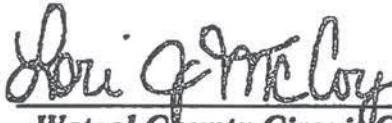
To the above named Defendant:

IN THE NAME OF THE STATE OF WEST VIRGINIA, you are hereby
Summoned and required to serve upon the Plaintiff's Attorney

**PETER D. FRIDAY
FRIDAY & COX LLC
1405 MCFARLAND RD
PITTSBURG PA 15216**

an answer including any related counterclaim you may have, to the complaint filed
against you in the above-styled civil action, a true copy of which is herewith
delivered to you. You are required to serve your answer within **30 Days** after
service of this summons upon you exclusive of the day of service. If you fail to do
so, judgment by default may be taken against you for the relief demanded in the
complaint and you will be thereafter barred from asserting in another action any
claim you may have which must be asserted by counterclaim in the above style civil
action.

Dated: July 7, 2020



Wetzel County Circuit Clerk



Office of the Secretary of State
Building 1 Suite 157-K
1900 Kanawha Blvd E.
Charleston, WV 25305

ED
7/21 JUL 17 AH 10:56
Lori Wetzel
CIRCUIT CLERK
WETZEL COUNTY, WV



Mac Warner

Secretary of State
State of West Virginia
Phone: 304-558-6000
886-767-8683
Visit us online:
www.wvsos.com

LORI WETZEL MCCOY
Wetzel County Courthouse
P. O. Box 263
New Martinsville, WV 26155-0263

Control Number: 259991

Defendant: SWN DRILLING COMPANY LLC
10000 ENERGY DRIVE
SPRING , TX 77389 US

County: Wetzel

Civil Action: 20-C-29

Certified Number: 92148901125134100002735132

Service Date: 7/13/2020

I am enclosing:

1 summons and complaint

which was served on the Secretary at the State Capitol as your statutory attorney-in-fact. According to law, I have accepted service of process in your name and on your behalf.

Please note that this office has no connection whatsoever with the enclosed documents other than to accept service of process in your name and on your behalf as your attorney-in-fact. Please address any questions about this document directly to the court or the plaintiff's attorney, shown in the enclosed paper, not to the Secretary of State's office.

Sincerely,

Mac Warner

Mac Warner
Secretary of State

To: Secretary of State
Building 1, Suite 157-K
1900 Kanawha Blvd., East
Charleston, WV 25305-0770

From: Lori J. McCoy
Circuit Clerk
P.O. Box 263
New Martinsville WV 26155

#20-C-29

PLAINTIFF: JEFFREY BLANIAR

VS.

DEFENDANT: SOUTHWESTERN ENERGY COMPANY;
SWN WELL SERVICES, LLC, ET-AL

PLEASE ACCEPT SERVICE ON THE FOLLOWING:

SWN DRILLING COMPANY, LLC
10000 ENERGY DRIVE
SPRING, TEXAS 77389

A check for \$ 20.00 is enclosed. Thank you

SIGNED

Lori J. McCoy

SEAL

ORIGINAL

SUMMONS
CIRCUIT COURT OF WETZEL COUNTY, WEST VIRGINIA

JEFFREY BLANIAR
Plaintiffs

VS

CIVIL ACTION NO: **20-C-29**
Judge: **Cramer**

**SOUTHWESTERN ENERGY COMPANY
SWN WELL SERVICES LLC ET-AL**
Defendant

Please Serve:
**SWN DRILLING COMPANY LLC
10000 ENERGY DRIVE
SPRING TEXAS 77389**

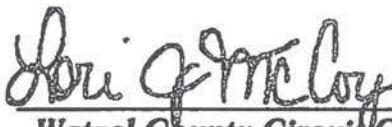
To the above named Defendant:

IN THE NAME OF THE STATE OF WEST VIRGINIA, you are hereby
Summoned and required to serve upon the Plaintiff's Attorney

**PETER D. FRIDAY
FRIDAY & COX LLC
1405 MCFARLAND RD
PITTSBURG PA 15216**

an answer including any related counterclaim you may have, to the complaint filed
against you in the above-styled civil action, a true copy of which is herewith
delivered to you. You are required to serve your answer within **30 Days** after
service of this summons upon you exclusive of the day of service. If you fail to do
so, judgment by default may be taken against you for the relief demanded in the
complaint and you will be thereafter barred from asserting in another action any
claim you may have which must be asserted by counterclaim in the above style civil
action.

Dated: July 7, 2020


Lori G. McCoy
Wetzel County Circuit Clerk



Office of the Secretary of State
Building 1 Suite 157-K
1900 Kanawha Blvd E.
Charleston, WV 25305

RECD
2020 JUL 17 AM 10:56
LORI WETZEL MCCOY
CIRCUIT CLERK
WETZEL COUNTY, WV



Mac Warner

Secretary of State

State of West Virginia

Phone: 304-558-6000

886-767-8683

Visit us online:

www.wvsos.com

LORI WETZEL MCCOY
Wetzel County Courthouse
P. O. Box 263
New Martinsville, WV 26155-0263

Control Number: 259992

Defendant: SWN PRODUCTION COMPANY LLC
10000 ENERGY DRIVE
SPRING , TX 77389 US

County: Wetzel

Civil Action: 20-C-29

Certified Number: 92148901125134100002735149

Service Date: 7/13/2020

I am enclosing:

1 summons and complaint

which was served on the Secretary at the State Capitol as your statutory attorney-in-fact. According to law, I have accepted service of process in your name and on your behalf.

Please note that this office has no connection whatsoever with the enclosed documents other than to accept service of process in your name and on your behalf as your attorney-in-fact. Please address any questions about this document directly to the court or the plaintiff's attorney, shown in the enclosed paper, not to the Secretary of State's office.

Sincerely,

Mac Warner

Mac Warner
Secretary of State

To: Secretary of State
Building 1, Suite 157-K
1900 Kanawha Blvd., East
Charleston, WV 25305-0770

From: Lori J. McCoy
Circuit Clerk
P.O. Box 263
New Martinsville WV 26155

#20-C-29

PLAINTIFF: JEFFREY BLANTAR

VS.

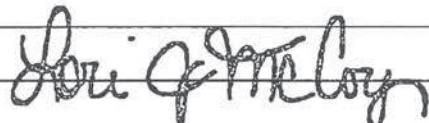
DEFENDANT: SOUTHWESTERN ENERGY COMPANY;
SWN WELL SERVICES, LLC, ET-AL

PLEASE ACCEPT SERVICE ON THE FOLLOWING:

SWN PRODUCTION COMPANY, LLC
10000 ENERGY DRIVE
SPRING, TEXAS 77389

A check for \$ 20.00 is enclosed. Thank you

SIGNED



SEAL

ORIGINAL

SUMMONS
CIRCUIT COURT OF WETZEL COUNTY, WEST VIRGINIA

JEFFREY BLANIAR

Plaintiffs

VS

CIVIL ACTION NO: 20-C-29

Judge: Cramer

SOUTHWESTERN ENERGY COMPANY
SWN WELL SERVICES LLC ET-AL
Defendant

ACCEPTED FOR
SERVICE OF PROCESS
IN THE STATE OF
WEST VIRGINIA
JUL 13 P 2:58

Please Serve:

**SWN PRODUCTION COMPANY LLC
10000 ENERGY DRIVE
SPRING TEXAS 77389**

To the above named Defendant:

IN THE NAME OF THE STATE OF WEST VIRGINIA, you are hereby
Summoned and required to serve upon the Plaintiff's Attorney

**PETER D. FRIDAY
FRIDAY & COX LLC
1405 MCFARLAND RD
PITTSBURG PA 15216**

an answer including any related counterclaim you may have, to the complaint filed
against you in the above-styled civil action, a true copy of which is herewith
delivered to you. You are required to serve your answer within **30 Days** after
service of this summons upon you exclusive of the day of service. If you fail to do
so, judgment by default may be taken against you for the relief demanded in the
complaint and you will be thereafter barred from asserting in another action any
claim you may have which must be asserted by counterclaim in the above style civil
action.

Dated: July 7, 2020

Lori McCoy
Wetzel County Circuit Clerk



Office of the Secretary of State
Building 1 Suite 157-K
1900 Kanawha Blvd E.
Charleston, WV 25305

ED

7/20 JUL 17 AM 10:56

LORI MCCOY
CIRCUIT CLERK
WETZEL COUNTY, WV



Mac Warner

Secretary of State

State of West Virginia

Phone: 304-558-6000
886-767-8683

Visit us online:
www.wvsos.com

LORI WETZEL MCCOY
Wetzel County Courthouse
P. O. Box 263
New Martinsville, WV 26155-0263

Control Number: 259993

Defendant: SWN ENERGY SERVICES
COMPANY LLC
10000 ENERGY DRIVE
SPRING, TX 77389 US

County: Wetzel

Civil Action: 20-C-29

Certified Number: 92148901125134100002735156

Service Date: 7/13/2020

I am enclosing:

1 summons and complaint

which was served on the Secretary at the State Capitol as your statutory attorney-in-fact. According to law, I have accepted service of process in your name and on your behalf.

Please note that this office has no connection whatsoever with the enclosed documents other than to accept service of process in your name and on your behalf as your attorney-in-fact. Please address any questions about this document directly to the court or the plaintiff's attorney, shown in the enclosed paper, not to the Secretary of State's office.

Sincerely,

Mac Warner

Mac Warner
Secretary of State

To: Secretary of State
Building 1, Suite 157-K
1900 Kanawha Blvd., East
Charleston, WV 25305-0770

From: Lori J. McCoy
Circuit Clerk
P.O. Box 263
New Martinsville WV 26155

#20-C-29

PLAINTIFF: JEFFREY BLANTAR

VS.

DEFENDANT: SOUTHWESTERN ENERGY COMPANY;
SWN WELL SERVICES, LLC, ET-AL

PLEASE ACCEPT SERVICE ON THE FOLLOWING:

SWN ENERGY SERVICES COMPANY, LLC
10000 ENERGY DRIVE
SPRING, TEXAS 77389

A check for \$ 20.00 is enclosed. Thank you

SIGNED



SEAL

ORIGINAL

SUMMONS
CIRCUIT COURT OF WETZEL COUNTY, WEST VIRGINIA

JEFFREY BLANIAR

Plaintiffs

VS

CIVIL ACTION NO: 20-C-29

Judge: Cramer

SOUTHWESTERN ENERGY COMPANY
SWN WELL SERVICES LLC ET-AL
Defendant

ACCEPTED FOR
SERVICE OF PROCESS
LIBRARY OF STATE
ATTORNEY GENERAL
STATE OF WEST VIRGINIA
2020 JR 13 P 2:58

Please Serve:

**SWN ENERGY SERVICES COMPANY LLC
10000 ENERGY DRIVE
SPRING TEXAS 77389**

To the above named Defendant:

IN THE NAME OF THE STATE OF WEST VIRGINIA, you are hereby
Summoned and required to serve upon the Plaintiff's Attorney

**PETER D. FRIDAY
FRIDAY & COX LLC
1405 MCFARLAND RD
PITTSBURG PA 15216**

an answer including any related counterclaim you may have, to the complaint filed
against you in the above-styled civil action, a true copy of which is herewith
delivered to you. You are required to serve your answer within **30 Days** after
service of this summons upon you exclusive of the day of service. If you fail to do
so, judgment by default may be taken against you for the relief demanded in the
complaint and you will be thereafter barred from asserting in another action any
claim you may have which must be asserted by counterclaim in the above style civil
action.

Dated: July 7, 2020


Wetzel County Circuit Clerk



Office of the Secretary of State
Building 1 Suite 157-K
1900 Kanawha Blvd E.
Charleston, WV 25305

RECEIVED
2020 JUL 17 AM 10:56
LORI MCCOY
CIRCUIT CLERK
WETZEL COUNTY, WV



Mac Warner
Secretary of State
State of West Virginia
Phone: 304-558-6000
886-767-8683
Visit us online:
www.wvsos.com

LORI WETZEL MCCOY
Wetzel County Courthouse
P. O. Box 263
New Martinsville, WV 26155-0263

Control Number: 259994

Defendant: SWN MIDSTREAM SERVICES CO
LLC
10000 ENERGY DRIVE
SPRING, TX 77389 US

County: Wetzel
Civil Action: 20-C-29
Certified Number: 92148901125134100002735163
Service Date: 7/13/2020

I am enclosing:

1 summons and complaint

which was served on the Secretary at the State Capitol as your statutory attorney-in-fact. According to law, I have accepted service of process in your name and on your behalf.

Please note that this office has no connection whatsoever with the enclosed documents other than to accept service of process in your name and on your behalf as your attorney-in-fact. Please address any questions about this document directly to the court or the plaintiff's attorney, shown in the enclosed paper, not to the Secretary of State's office.

Sincerely,

Mac Warner

Mac Warner
Secretary of State

To: Secretary of State
Building 1, Suite 157-K
1900 Kanawha Blvd., East
Charleston, WV 25305-0770

From: Lori J. McCoy
Circuit Clerk
P.O. Box 263
New Martinsville WV 26155

#20-C-29:

PLAINTIFF: JEFFREY BLANTAR

VS.

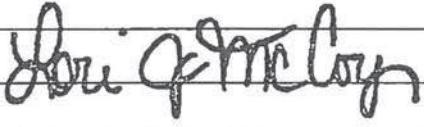
DEFENDANT: SOUTHWESTERN ENERGY COMPANY;
SWN WELL SERVICES, LLC, ET-AL

PLEASE ACCEPT SERVICE ON THE FOLLOWING:

SWN MIDSTREAM SERVICES, CO., LLC
10000 ENERGY DRIVE
SPRING, TEXAS 77389

A check for \$ 20.00 is enclosed. Thank you

SIGNED



SEAL

ORIGINAL

SUMMONS
CIRCUIT COURT OF WETZEL COUNTY, WEST VIRGINIA

JEFFREY BLANIAR
Plaintiffs

VS

CIVIL ACTION NO: 20-C-29
Judge: Cramer

SOUTHWESTERN ENERGY COMPANY
SWN WELL SERVICES LLC ET-AL
Defendant

Please Serve:
SWN MIDSTREAM SERVICES CO LLC
10000 ENERGY DRIVE
SPRING TEXAS 77389

ACCEPTED FOR
SERVICE OF PROCESS
JULY 13 P 2:58
IN THE NAME OF THE STATE
OF WEST VIRGINIA

To the above named Defendant:

IN THE NAME OF THE STATE OF WEST VIRGINIA, you are hereby
Summoned and required to serve upon the Plaintiff's Attorney

PETER D. FRIDAY
FRIDAY & COX LLC
1405 MCFARLAND RD
PITTSBURG PA 15216

an answer including any related counterclaim you may have, to the complaint filed
against you in the above-styled civil action, a true copy of which is herewith
delivered to you. You are required to serve your answer within **30 Days** after
service of this summons upon you exclusive of the day of service. If you fail to do
so, judgment by default may be taken against you for the relief demanded in the
complaint and you will be thereafter barred from asserting in another action any
claim you may have which must be asserted by counterclaim in the above style civil
action.

Dated: July 7, 2020

Jeri G. McCoy
Wetzel County Circuit Clerk



Office of the Secretary of State
Building 1 Suite 157-K
1900 Kanawha Blvd E.
Charleston, WV 25305

REC'D

2020 JUL 17 AM 10:56

LORI WETZEL MCCOY
CIRCUIT CLERK
WETZEL COUNTY, WV



Mac Warner
Secretary of State
State of West Virginia
Phone: 304-558-6000
888-767-8683
Visit us online:
www.wvsos.com

LORI WETZEL MCCOY
Wetzel County Courthouse
P. O. Box 263
New Martinsville, WV 26155-0263

Control Number: 259995

Defendant: SWN WATER RESOURCES
COMPANY LLC
10000 ENERGY DRIVE
SPRING, TX 77389 US

County: Wetzel

Civil Action: 20-C-29

Certified Number: 92148901125134100002735170

Service Date: 7/13/2020

I am enclosing:

1 summons and complaint

which was served on the Secretary at the State Capitol as your statutory attorney-in-fact. According to law, I have accepted service of process in your name and on your behalf.

Please note that this office has no connection whatsoever with the enclosed documents other than to accept service of process in your name and on your behalf as your attorney-in-fact. Please address any questions about this document directly to the court or the plaintiff's attorney, shown in the enclosed paper, not to the Secretary of State's office.

Sincerely,

Mac Warner

Mac Warner
Secretary of State

To: Secretary of State
Building 1, Suite 157-K
1900 Kanawha Blvd., East
Charleston, WV 25305-0770

From: Lori J. McCoy
Circuit Clerk
P.O. Box 263
New Martinsville WV 26155

#20-C-29

PLAINTIFF: JEFFREY BLANLAR

VS.

DEFENDANT: SOUTHWESTERN ENERGY COMPANY;
SWN WELL SERVICES, LLC, ET-AL

PLEASE ACCEPT SERVICE ON THE FOLLOWING:

SWN WATER RESOURCES COMPANY, LLC
10000 ENERGY DRIVE
SPRING, TEXAS 77389

A check for \$ 20.00 is enclosed. Thank you

SIGNED

Lori J. McCoy

SEAL

ORIGINAL

SUMMONS
CIRCUIT COURT OF WETZEL COUNTY, WEST VIRGINIA

JEFFREY BLANIAR
Plaintiffs

VS

CIVIL ACTION NO: 20-C-29
Judge: Cramer

SOUTHWESTERN ENERGY COMPANY
SWN WELL SERVICES LLC ET-AL
Defendant

ACCEPTED FOR
SERVICE OF PROCESS
JUL 13 P 2:58
STATE OF WEST VIRGINIA

Please Serve:
SWN WATER RESOURCES COMPANY LLC
10000 ENERGY DRIVE
SPRING TEXAS 77389

To the above named Defendant:

IN THE NAME OF THE STATE OF WEST VIRGINIA, you are hereby
Summoned and required to serve upon the Plaintiff's Attorney

PETER D. FRIDAY
FRIDAY & COX LLC
1405 MCFARLAND RD
PITTSBURG PA 15216

an answer including any related counterclaim you may have, to the complaint filed
against you in the above-styled civil action, a true copy of which is herewith
delivered to you. You are required to serve your answer within **30 Days** after
service of this summons upon you exclusive of the day of service. If you fail to do
so, judgment by default may be taken against you for the relief demanded in the
complaint and you will be thereafter barred from asserting in another action any
claim you may have which must be asserted by counterclaim in the above style civil
action.

Dated: July 7, 2020

John G. McCoy
Wetzel County Circuit Clerk



Office of the Secretary of State
Building 1 Suite 157-K
1900 Kanawha Blvd E.
Charleston, WV 25305

RECD
1120 JUL 17 AM 10:56
LORI WETZEL
CIRCUIT CLERK
WETZEL COUNTY, WV

LORI WETZEL MCCOY
Wetzel County Courthouse
P. O. Box 263
New Martinsville, WV 26155-0263



Mac Warner
Secretary of State
State of West Virginia
Phone: 304-558-6000
888-767-8683
Visit us online:
www.wvsos.com

Control Number: 259996

Defendant: THE GORMAN RUPP COMPANY
600 SOUTH AIRPORT ROAD
MANSFIELD, OH 44903 US

County: Wetzel
Civil Action: 20-C-29
Certified Number: 92148901125134100002735187
Service Date: 7/13/2020

I am enclosing:

1 summons and complaint

which was served on the Secretary at the State Capitol as your statutory attorney-in-fact. According to law, I have accepted service of process in the name and on behalf of your unauthorized foreign corporation.

Please note that this office has no connection whatsoever with the enclosed documents other than to accept service of process in the name and on behalf of your unauthorized foreign corporation as your attorney-in-fact. Please address any questions about this document directly to the court or the plaintiff's attorney, shown in the enclosed paper, not to the Secretary of State's office.

Sincerely,

Mac Warner

Mac Warner
Secretary of State

To: Secretary of State
Building 1, Suite 157-K
1900 Kanawha Blvd., East
Charleston, WV 25305-0770

From: Lori J. McCoy
Circuit Clerk
P.O. Box 263
New Martinsville WV 26155

#20-C-29

PLAINTIFF: JEFFREY BLANTAR

VS.

DEFENDANT: SOUTHWESTERN ENERGY COMPNAY;
SWN WELL SERVICES, LLC, ET-AL

PLEASE ACCEPT SERVICE ON THE FOLLOWING:

THE CORMAN-RUPP COMPANY
600 SOUTH AIRPORT ROAD
MANSFIELD, OHIO 44903

A check for \$ 20.00 is enclosed. Thank you

SIGNED

Lori J. McCoy

SEAL

ORIGINAL

SUMMONS
CIRCUIT COURT OF WETZEL COUNTY, WEST VIRGINIA

JEFFREY BLANIAR
Plaintiffs

VS

CIVIL ACTION NO: 20-C-29

Judge: Cramer

SOUTHWESTERN ENERGY COMPANY
SWN WELL SERVICES LLC ET-AL
Defendant

ACCEPTED FOR
SERVICE OF PROCESS
2020 JUL 13 P 2:59
CLERK OF STATE
WETZEL COUNTY
WEST VIRGINIA

Please Serve:
THE GORMAN-RUPP COMPANY
600 SOUTH AIRPORT RD
MANSFIELD OH 44903

To the above named Defendant:

IN THE NAME OF THE STATE OF WEST VIRGINIA, you are hereby
Summoned and required to serve upon the Plaintiff's Attorney

PETER D. FRIDAY
FRIDAY & COX LLC
1405 MCFARLAND RD
PITTSBURG PA 15216

an answer including any related counterclaim you may have, to the complaint filed
against you in the above-styled civil action, a true copy of which is herewith
delivered to you. You are required to serve your answer within **30 Days** after
service of this summons upon you exclusive of the day of service. If you fail to do
so, judgment by default may be taken against you for the relief demanded in the
complaint and you will be thereafter barred from asserting in another action any
claim you may have which must be asserted by counterclaim in the above style civil
action.

Dated: July 7, 2020

Lori J. McLean
Wetzel County Circuit Clerk



Office of the Secretary of State
Building 1 Suite 157-K
1900 Kanawha Blvd E.
Charleston, WV 25305

LED

2020 JUL 17 AM 10:56

LORI MCCOY
CIRCUIT CLERK
WETZEL COUNTY, WV

LORI WETZEL MCCOY
Wetzel County Courthouse
P. O. Box 263
New Martinsville, WV 26155-0263



Mac Warner
Secretary of State
State of West Virginia
Phone: 304-558-6000
888-767-8683
Visit us online:
www.wvsos.com

Control Number: 259997

Defendant: SWN E & P SERVICES LLC
10000 ENERGY DRIVE
SPRING, TX 77389 US

County: Wetzel
Civil Action: 20-C-29
Certified Number: 92148901125134100002735194
Service Date: 7/13/2020

I am enclosing:

1 summons and complaint

which was served on the Secretary at the State Capitol as your statutory attorney-in-fact. According to law, I have accepted service of process in your name and on your behalf.

Please note that this office has no connection whatsoever with the enclosed documents other than to accept service of process in your name and on your behalf as your attorney-in-fact. Please address any questions about this document directly to the court or the plaintiff's attorney, shown in the enclosed paper, not to the Secretary of State's office.

Sincerely,

Mac Warner

Mac Warner
Secretary of State

To: Secretary of State
Building 1, Suite 157-K
1900 Kanawha Blvd., East
Charleston, WV 25305-0770

From: Lori J. McCoy
Circuit Clerk
P.O. Box 263
New Martinsville WV 26155

#20-C-29.

PLAINTIFF: JEFFREY BLANIAR

VS.

DEFENDANT: SOUTHWESTERN ENERGY COMPANY;
SWN WELL SERVICES, LLC, ET-AL

PLEASE ACCEPT SERVICE ON THE FOLLOWING:

SWN E & P SERVICES, LLC
10000 ENERGY DRIVE
SPRING, TEXAS 77389

A check for \$ 20.00 is enclosed. Thank you

SIGNED

Lori J. McCoy

SEAL

ORIGINAL

SUMMONS
CIRCUIT COURT OF WETZEL COUNTY, WEST VIRGINIA

JEFFREY BLANIAR
Plaintiffs

VS

SOUTHWESTERN ENERGY COMPANY
SWN WELL SERVICES LLC ET-AL
Defendant

CIVIL ACTION NO: 20-C-29
JUL 13 P 2:59

Judge: Cramer

ACCEPTED FOR
SERVICE OF PROCESS

STATE OF WEST VIRGINIA

Please Serve:
SWN E&P SERVICES LLC
10000 ENERGY DRIVE
SPRING TEXAS 77389

To the above named Defendant:

IN THE NAME OF THE STATE OF WEST VIRGINIA, you are hereby
Summoned and required to serve upon the Plaintiff's Attorney

PETER D. FRIDAY
FRIDAY & COX LLC
1405 MCFARLAND RD
PITTSBURG PA 15216

an answer including any related counterclaim you may have, to the complaint filed
against you in the above-styled civil action, a true copy of which is herewith
delivered to you. You are required to serve your answer within **30 Days** after
service of this summons upon you exclusive of the day of service. If you fail to do
so, judgment by default may be taken against you for the relief demanded in the
complaint and you will be thereafter barred from asserting in another action any
claim you may have which must be asserted by counterclaim in the above style civil
action.

Dated: July 7, 2020

Sheri G McCoy
Wetzel County Circuit Clerk



Office of the Secretary of State
Building 1 Suite 157-K
1900 Kanawha Blvd E.
Charleston, WV 25305

RECD
2020 JUL 17 AM 10:56
Lori McCoy
CIRCUIT CLERK
WETZEL COUNTY, WV



Mac Warner
Secretary of State
State of West Virginia
Phone: 304-558-6000
886-767-8683
Visit us online:
www.wvsos.com

LORI WETZEL MCCOY
Wetzel County Courthouse
P. O. Box 263
New Martinsville, WV 26155-0263

Control Number: 259998

Defendant: JGB ENTERPRISES INC
115 METROPOLITAN DRIVE
LIVERPOOL, NY 13088 US

County: Wetzel

Civil Action: 20-C-29

Certified Number: 92148901125134100002735200

Service Date: 7/13/2020

I am enclosing:

1 summons and complaint

which was served on the Secretary at the State Capitol as your statutory attorney-in-fact. According to law, I have accepted service of process in the name and on behalf of your unauthorized foreign corporation.

Please note that this office has no connection whatsoever with the enclosed documents other than to accept service of process in the name and on behalf of your unauthorized foreign corporation as your attorney-in-fact. Please address any questions about this document directly to the court or the plaintiff's attorney, shown in the enclosed paper, not to the Secretary of State's office.

Sincerely,

Mac Warner

Mac Warner
Secretary of State

To: Secretary of State
Building 1, Suite 157-K
1900 Kanawha Blvd., East
Charleston, WV 25305-0770

From: Lori J. McCoy
Circuit Clerk
P.O. Box 263
New Martinsville WV 26155

#20-C-29

PLAINTIFF: JEFFREY BLANIAR

VS.

DEFENDANT: SOUTHWESTERN ENERGY COMPANY;
SWN WELL SERVICES, LLC ET-AL

PLEASE ACCEPT SERVICE ON THE FOLLOWING:

JGB ENTERPRISES, INC.
115 METROPOLITAN DRIVE
LIVERPOOL, NEW YORK 13088

A check for \$20.00 is enclosed. Thank you

SIGNED

Lori J. McCoy

SEAL

ORIGINAL

SUMMONS
CIRCUIT COURT OF WETZEL COUNTY, WEST VIRGINIA

JEFFREY BLANIAR

Plaintiffs

VS

CIVIL ACTION NO: 20-C-29

Judge: Cramer

SOUTHWESTERN ENERGY COMPANY
SWN WELL SERVICES LLC ET-AL
Defendant

Please Serve:

**JGB ENTERPRISES INC
115 METROPOLITAN DRIVE
LIVERPOOL NEW YORK 13088**

To the above named Defendant:

IN THE NAME OF THE STATE OF WEST VIRGINIA, you are hereby

Summoned and required to serve upon the Plaintiff's Attorney

**PETER D. FRIDAY
FRIDAY & COX LLC
1405 MCFARLAND RD
PITTSBURG PA 15216**

an answer including any related counterclaim you may have, to the complaint filed against you in the above-styled civil action, a true copy of which is herewith delivered to you. You are required to serve your answer within **30 Days** after service of this summons upon you exclusive of the day of service. If you fail to do so, judgment by default may be taken against you for the relief demanded in the complaint and you will be thereafter barred from asserting in another action any claim you may have which must be asserted by counterclaim in the above style civil action.

Dated: July 7, 2020

Lori G. Meloy
Wetzel County Circuit Clerk



Office of the Secretary of State
Building 1 Suite 157-K
1900 Kanawha Blvd E.
Charleston, WV 25305

ED
2020 JUL 17 AM 10:57
L.C. CIRCUIT CLERK
WETZEL COUNTY, WV



LORI WETZEL MCCOY
Wetzel County Courthouse
P. O. Box 263
New Martinsville, WV 26155-0263

Mac Warner
Secretary of State
State of West Virginia
Phone: 304-558-6000
886-767-8683
Visit us online:
www.wvsos.com

Control Number: 259999

Defendant: SOUTHWESTERN ENERGY
COMPANY
10000 ENERGY DRIVE
SPRNG, TX 77389 US

County: Wetzel

Civil Action: 20-C-29

Certified Number: 92148901125134100002735217

Service Date: 7/13/2020

I am enclosing:

1 summons and complaint

which was served on the Secretary at the State Capitol as your statutory attorney-in-fact. According to law, I have accepted service of process in the name and on behalf of your unauthorized foreign corporation.

Please note that this office has no connection whatsoever with the enclosed documents other than to accept service of process in the name and on behalf of your unauthorized foreign corporation as your attorney-in-fact. Please address any questions about this document directly to the court or the plaintiff's attorney, shown in the enclosed paper, not to the Secretary of State's office.

Sincerely,

Mac Warner

Mac Warner
Secretary of State

To: Secretary of State
Building 1, Suite 157-K
1900 Kanawha Blvd., East
Charleston, WV 25305-0770

From: Lori J. McCoy
Circuit Clerk
P.O. Box 263
New Martinsville WV 26155

#20-C-29

PLAINTIFF: JEFFREY BLANTAR

VS.

DEFENDANT: SOUTHWESTERN ENERGY COMPANY;
SWN WELL SERVICES, LLC, ET-AL

PLEASE ACCEPT SERVICE ON THE FOLLOWING:

SOUTHWESTERN ENERGY COMPANY
10000 ENERGY COMPANY
SPRING, TEXAS 77389

A check for \$ 20.00 is enclosed. Thank you

SIGNED

Lori J. McCoy

SEAL

ORIGINAL

SUMMONS
CIRCUIT COURT OF WETZEL COUNTY, WEST VIRGINIA

JEFFREY BLANIAR
Plaintiffs

VS

CIVIL ACTION NO: 20-C-29
Judge: Cramer

SOUTHWESTERN ENERGY COMPANY
SWN WELL SERVICES LLC ET-AL
Defendant

Please Serve:
SOUTHWESTERN ENERGY COMPANY
10000 ENERGY DR
SPRING TEXAS 77389

To the above named Defendant:

IN THE NAME OF THE STATE OF WEST VIRGINIA, you are hereby
Summoned and required to serve upon the Plaintiff's Attorney

PETER D. FRIDAY
FRIDAY & COX LLC
1405 MCFARLAND RD
PITTSBURG PA 15216

an answer including any related counterclaim you may have, to the complaint filed against you in the above-styled civil action, a true copy of which is herewith delivered to you. You are required to serve your answer within **30 Days** after service of this summons upon you exclusive of the day of service. If you fail to do so, judgment by default may be taken against you for the relief demanded in the complaint and you will be thereafter barred from asserting in another action any claim you may have which must be asserted by counterclaim in the above style civil action.

Dated: July 7, 2020

Joni G. McElroy
Wetzel County Circuit Clerk



Office of the Secretary of State
Building 1 Suite 157-K
1900 Kanawha Blvd E.
Charleston, WV 25305

ED

7/20 JUL 17 AM 10:57

Lori C. McCoy
CIRCUIT CLERK
WETZEL COUNTY, WV



Mac Warner

Secretary of State

State of West Virginia

Phone: 304-558-6000

886-767-8683

Visit us online:

www.wvsos.com

LORI WETZEL MCCOY
Wetzel County Courthouse
P. O. Box 263
New Martinsville, WV 26155-0263

Control Number: 260000

Defendant: CAMPBELL FITTINGS INC
301 SOUTH WASHINGTON STREET
BOYERTOWN, PA 19512 US

County: Wetzel

Civil Action: 20-C-29

Certified Number: 92148901125134100002735224

Service Date: 7/13/2020

I am enclosing:

1 summons and complaint

which was served on the Secretary at the State Capitol as your statutory attorney-in-fact. According to law, I have accepted service of process in the name and on behalf of your unauthorized foreign corporation.

Please note that this office has no connection whatsoever with the enclosed documents other than to accept service of process in the name and on behalf of your unauthorized foreign corporation as your attorney-in-fact. Please address any questions about this document directly to the court or the plaintiff's attorney, shown in the enclosed paper, not to the Secretary of State's office.

Sincerely,

Mac Warner

Mac Warner
Secretary of State

To: Secretary of State
Building 1, Suite 157-K
1900 Kanawha Blvd., East
Charleston, WV 25305-0770

From: Lori J. McCoy
Circuit Clerk
P.O. Box 263
New Martinsville WV 26155

#20-C-29

PLAINTIFF: JEFFREY BLANLAR

VS.

DEFENDANT: SOUTHWESTERN ENERGY COMPANY;
SWN WELL SERVICES, LLC, ET-AL

PLEASE ACCEPT SERVICE ON THE FOLLOWING:

CAMPBELL FITTINGS, INC
301 SOUTH WASHINGTON STREET
BOYERTOWN, PENNSYLVANIA 19512

A check for \$ 20.00 is enclosed. Thank you

SIGNED

Lori J. McCoy

SEAL

ORIGINAL

SUMMONS
CIRCUIT COURT OF WETZEL COUNTY, WEST VIRGINIA

JEFFREY BLANIAR
Plaintiffs

VS

SOUTHWESTERN ENERGY COMPANY
SWN WELL SERVICES LLC ET-AL
Defendant

CIVIL ACTION NO: **20-C-29**
Judge: **Cramer**

ACCEPTED FOR
SERVICE OF PROCESS

JUL 13 P 2:59
STATE OF WEST VIRGINIA

Please Serve:
CAMPBELL FITTINGS INC
301 SOUTH WASHINGTON ST
BOYERTOWN PA 19512

To the above named Defendant:

IN THE NAME OF THE STATE OF WEST VIRGINIA, you are hereby
Summoned and required to serve upon the Plaintiff's Attorney

PETER D. FRIDAY
FRIDAY & COX LLC
1405 MCFARLAND RD
PITTSBURG PA 15216

an answer including any related counterclaim you may have, to the complaint filed
against you in the above-styled civil action, a true copy of which is herewith
delivered to you. You are required to serve your answer within **30 Days** after
service of this summons upon you exclusive of the day of service. If you fail to do
so, judgment by default may be taken against you for the relief demanded in the
complaint and you will be thereafter barred from asserting in another action any
claim you may have which must be asserted by counterclaim in the above style civil
action.

Dated: July 7, 2020

Lori C. McWay
Wetzel County Circuit Clerk

